

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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MUBASHIR KHALIF HUSSEN,  
MAHAMED EYDARUS, and JAVIER DOE  
*on behalf of themselves and others similarly  
situated,*

Plaintiffs,

v.

Case No. 0:26-cv-00324-ECT-ECW

KRISTI NOEM, *in her official capacity as Secretary  
of the U.S. Department of Homeland Security; U.S.  
Department of Homeland Security; U.S. Immigration  
and Customs Enforcement; TODD LYONS, in his  
official capacity as Acting Director of U.S.  
Immigration and Customs Enforcement; DAVID  
EASTERWOOD, in his official capacity as Acting  
Director, Saint Paul Field Office, U.S. Immigration  
and Customs Enforcement; ; U.S. Customs and Border  
Protection; RODNEY SCOTT, in his official capacity  
as Commissioner of U.S. Customs and Border  
Protection; U.S. Border Patrol; MICHAEL W.  
BANKS, in his official capacity as Chief of U.S.  
Border Patrol; and GREGORY BOVINO, in his  
official capacity as Commander of the U.S. Border  
Patrol,  
in their official capacities,*

Defendants.

**DEFENDANTS' NOTICE OF  
SUPPLEMENTAL FILING  
REGARDING "OPERATION  
METRO SURGE"**

Pursuant to this Court’s order on February 18, 2026, allowing “Defendants [to] file an affidavit or declaration regarding the drawdown,” ECF No. 158, Defendants submit the following declarations regarding “Operation Metro Surge”:

Exhibit A: Declaration of Marty C. Raybon, Sr., U.S. Customs and Border Protection’s Lead Field Coordinator for U.S. Immigration and Customs Enforcement’s Minneapolis operation, Operation Metro Surge;

Exhibit B: Declaration of Sam Olson, Field Office Director of the St. Paul Field Office of the Department of Homeland Security, Immigration and Customs Enforcement, Enforcement and Removal Operations.

Defendants submit no other declarations or documentation in regard to Operation Metro Surge.

DATE: February 23, 2026

Respectfully Submitted,

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Assistant Attorney General, Civil Division

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Counsel to the Assistant Attorney General

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/s/ Shane A. Young  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed on February 23, 2026, through the ECF system, and that it will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: February 23, 2026

/s/ Shane Young  
SHANE YOUNG  
Trial Attorney  
United States Department of Justice  
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*Attorney for Defendants*