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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **OAKLAND DIVISION**

10 VICTORIA LAW,
11 PLAINTIFF,
12 vs.
13 FEDERAL BUREAU OF PRISONS,
14 DEFENDANT.

CASE No.: 4:24-cv-06628-YGR

**PLAINTIFF’S NOTICE OF SUPPLEMENTAL
EVIDENCE**

HON. YVONNE GONZALEZ ROGERS
COURTROOM NUMBER: 1

15
16 **Notice of Supplemental Evidence**

17 Plaintiff Victoria Law respectfully submits this notice of supplemental evidence in the above-
18 captioned case in connection with the fully briefed Motion for Partial Judgment on the Pleadings and
19 Declaratory Judgment. *See* Plaintiff’s Motion filed August 19, 2025 (*Dkt.* No. 45), Defendant’s
20 Opposition filed September 2, 2025 (*Dkt.* No. 47), Plaintiff’s Reply filed September 9, 2025 (*Dkt.* No.
21 48), Defendant’s Objection to Reply Evidence filed September 16, 2025 (*Dkt.* No. 49), and Plaintiff’s
22 Response to Defendant’s Objection filed September 23, 2025 (*Dkt.* No. 50). On September 25, 2025, the
23 Court vacated the September 30, 2025 hearing and advised that the Motion would be decided on the
24 papers or reset as appropriate. (*Dkt.* No. 51, text-only entry.)
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1 This supplemental evidence concerns Judge Tse’s May 30, 2025, Order requiring BOP to release
2 responsive records to Plaintiff on the last day of every month (*Dkt.* No. 42) and BOP’s failure to make
3 the September 2025 release. This evidence bears directly on Plaintiff’s request for declaratory relief and
4 the scope of any prospective order.
5

6 The email exchange attached as Exhibit A to the Henry Declaration documents BOP’s failure to
7 comply with the Court’s monthly release directive. Judge Tse ordered release by September 30, 2025.
8 BOP did not release any records by that date. *Id.*
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10 The government shutdown began after that date, on October 1, 2025. Plaintiff’s counsel emailed
11 BOP counsel Assistant United States Attorney Michael T. Pyle on October 2, 2025, inquiring about the
12 failure to produce and the status of production. *Id.* Based on the October 6, 2025, representations of
13 Assistant United States Attorney Michael T. Pyle, production is currently stopped. *Id.* Due to the
14 shutdown, BOP counsel cannot obtain any information from the BOP staff. *Id.* Based on the
15 representations of Attorney Pyle, the USA will not be holding meet and confers in this case during the
16 shutdown. *Id.*
17

18 This new information is offered to update the Court on the status of Defendant’s compliance
19 with the May 30, 2025, Order and to assist in the resolution of Plaintiff’s pending Motion.
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21 Respectfully submitted,

22 DATED: October 7, 2025

23 Signature: _____/s/_____

24 By: Caitlin Kelly Henry, Esq.
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