Caitlin Kelly Henry, Esq. (SBN #287949)
1440 Broadway #200
Oakland, CA 94612
Telephone: (510)277-2025
Email: ckh@caitlinkellyhenry.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

VICTORIA LAW, PLAINTIFF, VS. FEDERAL BUREAU OF PRISONS, DEFENDANT.	CASE NO.: 4:24-CV-06628-YGR **PLAINTIFF'S NOTICE OF SUPPLEMENTAL EVIDENCE**

Notice of Supplemental Evidence

Plaintiff Victoria Law respectfully submits this notice of supplemental evidence in the above-captioned case in connection with the fully briefed Motion for Order to Show Cause as to Why BOP Should Not Be Held in Contempt (November 18, 2025)(*Dkt.* No. 54), and Motion for Partial Judgment on the Pleadings and Declaratory Judgment (*Dkt.* No. 45). *See* Plaintiff's Motion filed August 19, 2025 (*Dkt.* No. 45), Defendant's Opposition filed September 2, 2025 (*Dkt.* No. 47), Plaintiff's Reply filed September 9, 2025 (*Dkt.* No. 48), Defendant's Objection to Reply Evidence filed September 16, 2025 (*Dkt.* No. 49), and Plaintiff's Response to Defendant's Objection filed September 23, 2025 (*Dkt.* No. 50). On September 25, 2025, the Court vacated the September 30, 2025, hearing and advised that the Motion would be decided on the papers or reset as appropriate. (*Dkt.* No. 51, text-only entry.) This supplemental evidence concerns Judge Tse's May 30, 2025, Order requiring BOP to release responsive

records to Plaintiff on the last day of every month (*Dkt.* No. 42). This evidence bears directly on Plaintiff's request for relief and the scope of any prospective order.

Plaintiff has sought to keep the Court informed of the steps BOP has or has not taken, to comply with the Court's Order (*Dkt.* No. 42) through a series of Notices of Supplemental Evidence, on October 7, 2025 (*Dkt.* No. 52), November 3, 2025 (*Dkt*. No. 53), December 2, 2025 (*Dkt*. No. 55).

Attached is BOP's letter accompanying Release 9 on December 19, 2025 representing that this release satisfied its production obligations for September 2025 and December 2025. The release consisted of printing BOP's "reading room" website of Program Statements and related policy materials. It totaled approximately 2,021 pages.

Attached is BOP's letter accompanying Release 10 on January 30, 2026 representing that the release was responsive to FOIA Item Numbers 6, 7, and 13 concerning status review prior to transfer, grievances related to compassionate release, and grievances related to the transfer and closure of FCI Dublin. BOP stated that 507 pages were reviewed, resulting in 24 pages released in full, 314 pages released in part, 70 pages withheld in full, 1 page deemed duplicative, 26 pages identified as non agency records, and 72 pages deemed non responsive. BOP stated that it reviewed 507 pages, our of the 1,000 pages the Order mandated it review for the January 2026 production period. BOP acknowledged in its determination letter that the release constituted only the first half of the January 2026 production and that the remaining portion would be produced after the January 30, 2026 deadline, with completion deferred until February 2026.

This new information is offered to update the Court on the status of Defendant's compliance with the May 30, 2025, Order and to assist in the resolution of Plaintiff's pending Motions.

Respectfully submitted,

DATED: February 2, 2026

Signature: ____/s/_____

By: __Caitlin Kelly Henry, Esq._____

Attorney for Plaintiff