



Michael K.T. Tan
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September 14, 2026

VIA U.S. MAIL & EMAIL

Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

**Re: *Putra v. Lopez-Campos*, No. 25-1415
Rhoney v. Barbosa da Cunha, No. 26-104
Buenrostro-Mendez v. Blanche, No. 26-43**

Dear Mr. Harris,

I write to notify the Court formally of a recent development relevant to the certiorari-stage briefing in the three above-captioned cases. On September 11, 2026, the Court dismissed *Genalo v. G.M.*, No. 25-886, which was to be argued on October 13, 2026. The dismissal of *Genalo* relates to the three pending certiorari petitions in that the Respondents in *Putra* and *Rhoney*, and the Petitioners in *Buenrostro-Mendez*, have argued, in part, that the Court should not take up the constitutional claim presented by the Petitioners in the former two cases because a related constitutional issue was before the Court in *Genalo*. See Br. in Opp'n 3, 19, 24–25, *Putra v. Lopez-Campos*, No. 25-1415 (Sup. Ct. Aug. 24, 2026); Resp. to Cert. Pet. 3, 17–19, *Rhoney v. Barbosa da Cunha*, No. 26-104 (Sup. Ct. Aug. 21, 2026); Cert. Pet. 4, 29–30, *Buenrostro-Mendez v. Blanche*, No. 26-43 (Sup. Ct. July 2, 2026).

Notwithstanding the dismissal of *Genalo*, the *Putra* and *Rhoney* Respondents and *Buenrostro-Mendez* Petitioners maintain that the Court should grant only on the statutory issue presented in *Buenrostro-Mendez* and *Rhoney* for the reasons already set forth in the briefs in these three cases. See Br. in Opp'n. 3–4, 18–23, *Putra v. Lopez-Campos*, No. 25-1415 (Sup. Ct. Aug. 24, 2026); Resp. to Cert. Pet. 18, *Rhoney v. Barbosa da Cunha*, No. 26-104 (Sup. Ct. Aug. 21, 2026); Cert. Pet. 29–32, *Buenrostro-Mendez v. Blanche*, No. 26-43 (Sup. Ct. July 2, 2026).



Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michael K.T. Tan", written over a horizontal line.

Michael K.T. Tan
*Counsel of Record for Respondents
Lopez-Campos, Barbosa da Cunha,
and Petitioners Buenrostro-Mendez*

Cc: D. John Sauer, Solicitor General