

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

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Edwin Hernandez-Campos,

Petitioner,

v.

Kristi Noem, Secretary of Homeland Security,  
*et al.*,

Respondents.

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) No. 1:25-cv-1020-MJM  
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**AMENDED JOINT STATUS REPORT REGARDING PETITIONER'S  
EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Respondents, United States Department of Homeland Security, *et al.* ("Respondents" or "DHS") by and through undersigned counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, and Petitioner Edwin Hernandez-Campos ("Petitioner"), by and through undersigned counsel, Simon Sandoval-Moshenberg, file this Joint Status Report.

1. On March 27, 2025, Petitioner filed a Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. (ECF No. 1) ("Petition"). On March 28, 2025, upon learning that Petitioner was to be flown to California, Petitioner filed an Emergency Motion for Temporary Restraining Order, alleging that Petitioner was being removed to El Salvador. (ECF No. 2). As Petitioner was detained by ICE for "Removal," he believed that he was being removed to El Salvador, which Petitioner alleged would be impermissible since he had previously been granted withholding of removal as to that country. Unbeknownst to Petitioner, Respondents were not planning to remove Petitioner to a El Salvador but to a third country.

2. On March 29, 2025, this Court entered a Temporary Restraining Order enjoining Respondents from removing Petitioner to El Salvador or outside the District of Maryland for a period of fourteen (14) days, up and including April 12, 2025. (“TRO”) (ECF No. 3). The Court also set a briefing schedule and hearing on the matter. (ECF No. 4)

3. Subsequent to the foregoing, the parties learned that the Department of Homeland Security is subject to a temporary restraining order entered on March 28, 2025, that generally prohibits the removal of Petitioner to a country other than the country designated in his final order of removal. *See* ECF No. 9 at Exhibit 2, Temporary Restraining Order issued in *D.V.D., et al. v. U.S. Dep’t of Homeland Security, et al.*, Civ. No. 25-10676-BEM (D. Mass. Mar. 28, 2025) (ECF No. 34 at 2) (“*D.V.D. TRO*”) (enjoining DHS and others from “[r]emoving any individual subject to a final order of removal from the United States to a third country, i.e., a country other than the country designated for removal in immigration proceedings” unless certain conditions are met). A hearing on Petitioner’s Motion for a Preliminary Injunction and Motion for Class Certification in *D.V.D.* was set for April 10, 2025. (ECF No. 33 and 34.) The parties agreed that the Petitioner in this case is covered by the *D.V.D. TRO*.

4. In light of the foregoing, on April 4, 2025, the parties filed a Joint Status Report seeking to extend the TRO in the instant matter, as well as this Court’s briefing schedule and hearing, until Monday April 14, 2025.

5. On April 4, 2025, this Court issued an order extending the TRO until April 14, 2025, cancelling the existing briefing schedule and hearing, and ordering the parties to meet and confer to propose a new briefing schedule by April 14, 2025. (ECF No. 10.)

6. On April 8, 2025, the Court issued a paperless order scheduling a status conference call for Monday, April 14, 2025, at 3:00 pm. (ECF No. 11.)

7. On April 10, 2025, the Court in *D.V.D.* held an argument on Petitioner's Motion for Preliminary Injunction and Stay and Motion to Certify the Class. (*D.V.D.*, 25-10676-BEM) (ECF. No. 62.) Following the hearing, the Court took the Motions under advisement and ordered that the "TRO remains in place and is extended until the Motion for Preliminary Injunction is ruled upon." (*Id.*) The Court set a status conference for April, 28, 2025 at 11:00 a.m.

8. In light of the foregoing, the parties moved to further extend the TRO in the instant matter, as well as the status conference call, until April 28, 2025. On April 14, 2025, the Court issued an order extending the TRO and conference call in the instant matter until April 28, 2025.

9. On April 18, 2025, the Court in *D.V.D.* issued an order (*D.V.D.*, 25-10676-BEM) (ECF No. 64) granting the Petitioner's motion for class certification (ECF. No. 4) and motion for preliminary injunction (ECF. No. 6).

10. On April 28, 2025, the parties filed a joint status report agreeing that the Petitioner in this matter is a member of the certified class in *D.V.D.* and agreeing to extend the TRO in the instant matter until May 12, 2025.

11. On April 28, 2025, the Court entered an order directing the parties to file a joint status report by May 9, 2025.

12. On May 8, 2025, DHS provided Petitioner with a Notice of Removal, informing him that they intend to remove him to Mexico.

13. On May 8, 2025, Petitioner's counsel provided DHS notice that Petitioner has a credible fear of removal to Mexico, as well as nineteen (19) other Central and South American and Caribbean countries. and requested a Reasonable Fear Interview.

14. DHS is currently assessing when Petitioner's credible fear interview can be scheduled.

15. On May 12, 2025, the parties conferred and agreed to extend the TRO in the instant matter for an additional two weeks, until May 26, 2025.

Respectfully submitted,

Date: May 12, 2025

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**CERTIFICATE OF SERVICE**

I, S. Nicole Nardone, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the ECF.

/s/ S. Nicole Nardone  
Assistant United States Attorney

Dated: May 12, 2025