

RECEIVED
U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

Winn Correctional Center
560 Gum Springs Road
Winnfield, LA 71483

APR 11 2025

DETAINED

BY: DANIEL J. MCCOY, CLERK

CLERK, UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
TOM STAGG UNITED STATES COURT
HOUSE 300 FANNIN STREET, SUITE 1167
SHREVEPORT, LOUISIANA 71101-3083

In the matter of:)

ALI, Abdikhalag Mohamed)

Petitioner: PRO SE)

v.)

Department of Homeland Security DHS)

U.S. ICE – Winnfield Detention)

New Orleans, Field Office)

WILLIAMS, J., WOODRUFF, C.,)

AINLEY, R., HARPER, M. & ET AL)

Respondents)

Case No. 1:25-cv-00419-TAD-JPM

Type of Case: Petition

Type of Petition: Writ of Habeas

Corups Under 28 U.S.C. § 2241

MOTION TO AMEND ADDITIONAL BRIEFING IN SUPPORT OF
PETITIONER'S WRIT OF HABEAUS CORUPS UNDER 28 U.S.C. § 2241

**PETITIONER'S AMENDING ADDITIONAL BRIEFING IN SUPPORT FOR A WRIT
OF HABEAS CORUPS UNDER 28 U.S.C. § 2241**

I, Ali Abdikhalaq Mohamed, A# [REDACTED] ("Petitioner"), appearing pro se, respectfully moving that to this Court amending additional briefing in Support of the Petitioner's Writ of Habeas Corups Under 28 U.S.C. 28 § 2241; Case No. 1:25-cv-00419-TAD-JPM.

STATEMENT OF FACTS

1. Petitioner is citizen and native of Somalia, born, raised in Somalia and posses Somalian passport number: P [REDACTED].
2. Somalia is Designated Country for Temporary Protected Status ("TPS") Program by the United States Citizenship and Immigration Services ("USCIS").
3. Petitioner had properly filed applications for TPS and has been deemed prima facie eligible for TPS under 8 CFR 244.10(a)
4. USCIS at Vermont Service Center received the Petitioner's application on August 23rd 2024; Subsequently, the USCIS issued notice of receipt number IOE 0927379530 on August 27th 2024.
5. On August 30th 2024, the USCIS mailed to Petitioner the Bio-metrics appointment notice and scheduled Petitioner to appear for his Bio-metrics appointment at Application Support Center ("ASC"), USCIS St. Paul, Minnesota on September 16th 2024 at 8:00 AM.
6. Petitioner could not appear at ASC St Paul, Minnesota as scheduled because the petitioner has been detained under ICE custody and ICE denied to give him permission nor arranged means of attending Bio-metrics appointment at any nearest ASC, resulting in profound violations of Due Process depriving Petitioner's right of justice.

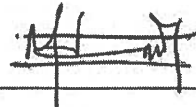
7. Deportation Officer ("DO"), Mr. Woodruff III, Charles requested proof of the Petitioner's TPS application and he would review the Petitioner's ICE custody status and release him from detention once his application approved.
8. The processing of the Petitioner's TPS application is still pending with USCIS in limbo. It has not completed yet just because Petitioner was not able to appear for Bio-metric appointment; resulting in profound violation of his Due process protections of the law In Violation Of The Fifth and Fourteenth Amendments To The United States Constitution.
9. Immigration Judge, Honorable Kandra Robbins ordered Petitioner removed to Somalia
10. Until today the Somalia Consulate has not issued Petitioner's traveling documents to ICE.
11. ICE is actively seeking to remove petitioner to Ethiopia, which is not a country of his citizenship.
12. Petitioner fear he would be persecuted or tortured upon removal to Ethiopia because:-
 - i. Petitioner is not Ethiopia Citizen, He is SOMALIAN
 - ii. Ethiopian Immigration laws prohibit duo citizenship.
 - iii. Petitioner broke the Ethiopian Immigration laws by acquiring Ethiopian passport fraudulently from a smuggler.
 - iv. Petitioner will face charges upon removed to Ethiopia just because he possessed the Ethiopia passport while is not a lawful citizen of Ethiopia.
 - v. Ethiopian Immigration laws prohibit duo citizenship.
 - vi. The petitioner has no legal status in Ethiopia, and that, therefore, there is good reason to believe his removal is not significantly likely in the reasonably foreseeable future to Ethiopia.

I, Petitioner, Abdikhalaq Mohamed Ali, declare and pledge under penalty of perjury that the above statements, information and documents are true and correct to the best of my knowledge. I understand that a false statement of material fact may serve as basis for prosecution for perjury.

Hereby, Petitioner, ALI Abdikhalaq Mohamed respectfully requests the following:-

1. The Court to exercise its power, its authority to sua sponte, and review Petitioner request and accept Petitioner's amended additional briefing in support for Writ of Habeas Corpus Under 28 U.S.C. 28 § 2241.
2. The Court to exercise its power, its authority to sua sponte, and order Respondents to allow Petitioner to appear for a Bio-metric appointment or arrange means of attending Bio-metrics appointment at any nearest ASC.
3. The Court to exercise its power, its authority to sua sponte, and order DHS to complete the processing of the TPS application in the "near future" and that thereafter petitioner will either be granted TPS and be released from immigration detention or, he will be removed to Somalia.
4. The Court to use its authority under 28 U.S.C. § 2243 to order Respondents to file return responses within seven days, unless they can show good cause for additional time.
5. In order to permit full judicial review of the claims herein and requested petition, Petitioner respectfully requests that the Court order Respondents not to deport the Petitioner to Ethiopia due to fear of his life until this Court reaching to the final order of this petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'ALI, Abdikhalaq Mohamed', is written over a horizontal line.

ALI, Abdikhalaq Mohamed