

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

ABDIKHALAQ MOHAMED)
ALI,) CIVIL ACTION NO. 25-cv-00419
) SEC. P
)
) JUDGE DOUGHTY
VERSUS)
)
) MAGISTRATE JUDGE PEREZ-
JUSTIN WILLIAMS, ET AL)
) MONTES
)
)

STATE OF MINNESOTA)
)
)ss.
COUNTY OF HENNEPIN)

I, David Wilson, being first duly sworn upon oath, deposes and states as follows:

1. I am an attorney licensed in Minnesota since 1997. My attorney's license number is 0280239. My place of business is Wilson Law Group, 3019 Minnehaha Avenue, Minneapolis, MN 55406. My direct phone number is 612-436-7112. The Court granted my motion for pro hac vice admission into this matter
2. I attach as Exhibit A, a true and correct copy of Petitioner's 2024 Application for Temporary Protected Status, with appropriate redactions to protect personal information.
3. I attach as Exhibit B, a true and correct copy of the Notice of Intent to Deny Petitioner's 2024 application for Temporary Protected Status issued by the US Citizenship & Immigration Services.
4. I attach as Exhibit C, a true and correct copy of Petitioner's response to the US Citizenship & Immigration Services' Notice of Intent to Deny his 2024 application for Temporary Protected Status, with appropriate redactions to protect personal information.

5. I attach as Exhibit D, a true and correct copy of the I-876A created by a Border Patrol agent on March 17, 2023, redacted to protect the Agent's identity.
6. I attach as Exhibit E, a true and correct copy of Respondent's forensic report of Petitioner's corroborating documents from his asylum case, redacted to protect the Agent's and Agency counsel's identities.
7. I attach as Exhibit F, a true and correct copy of USCIS Policy Manual, Vol. 1, Pt. C, Ch. 2 § B (June 24, 2025).
8. I attach as Exhibit G, a true and correct copy of Cameron Giebink's affidavit in relation to efforts to contact Mr. Abdikhalaq Mohamed Ali.
9. I attach as Exhibit H, a true and correct copy of Mr. Giebink's G-28 notice of representation before ICE.
10. I attach as Exhibit I, a true and correct copy of FedEx Tracking data for delivery of EOIR forms to Mr. Abdikhalaq Mohamed Ali.
11. I attach as Exhibit J, a true and correct copy of ICE's online booking confirmation of appointment for Cameron Giebink to speak to Mr. Ali at 8:00 AM on July 22, 2025.
12. I attach as Exhibit K, a true and correct copy of ICE's notice of cancellation of Cameron Giebink's appointment to speak to Mr. Ali at 8:00 AM on July 22, 2025.
13. I attach as Exhibit L, a true and correct copy of envelope of returned documents sent by Respondents to Cameron Giebink on July 18, 2025.
14. I attach as Exhibit M, a true and correct copy of a screen grab from ICE's online detainee locator taken at 8:54 AM on July 23, 2025.

I hereby declare under penalty of perjury that everything in this declaration is true and correct.

/s/ David L. Wilson, Esq.

July 25, 2025

David L. Wilson

MN #0280239

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