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June 3, 2026

VIA ECF

The Honorable Jerry W. Blackwell
United States District Judge
316 North Robert Street
St. Paul, MN 55101
blackwell_chambers@mnd.uscourts.gov

RE: *Mohammed H. v. Donald J. Trump, et al.*
Civil Case Number: 25-cv-01576 (JWB/DTS)

Dear Judge Blackwell:

Federal Respondents thank Petitioner's Counsel for cooperatively working to resolve this matter. Federal Respondents are in complete agreement that there exists "no further need for the evidentiary hearing" or "further relief" in this case. *See* ECF #92.

Regarding the alleged inaccuracies that Petitioner's Counsel felt compelled to identify for Your Honor, Federal Respondents respectfully state that the Declarations bear out Federal Respondents' position throughout these recent proceedings: that Petitioner's January 2026 arrest was the result of human error, that corrective action was taken to address that human error, and that ICE operational systems currently reflect both the bond and habeas orders and – in all caps – the need for further review of Petitioner's file before any additional enforcement action occurs. On this record, no further relief is needed.

If the Court has additional questions, Federal Respondents suggest written submissions as the most efficient way to address them. Federal Respondents respectfully submit that this case can be closed, as Petitioner was granted relief and remains out of custody.

Sincerely,

DANIEL N. ROSEN
United States Attorney

s/ David R. Hackworthy
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