

Petitioner

FILED

SA-25-CV-00447-JKP

A#

JUL 23 2025

Reply

EXHIBIT A

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY DEPUTY CLERK

1. Petitioner is the physical of Respondents and U.S Immigration and Customs Enforcement ICE petitioner is detained at the South Texas ICE processing Center.
2. petitioner Continued detention Violates petitioner right to Substantive due process through a deprivation of Core Liberty interest in Freedom bodily restraint.
3. on September 7, 2024 HAGOS ERO San Antonio Lodged a Notice of Action - Immigration Detainer. I been Detaine Since Sep 7, 2024. I couldn't get out of Jail. Because the AN Immigration Detainer.
4. on September 7, 2024 "Notice of Action Immigration Detainer". petitioner's Continued detention by Respondents is UNLAWFUL and Contravenes 8 U.S.C. § 1231 (a)(6) as interpreted by Supreme Court in Zadvydas. Ice has been trying unsuccessfully to deport me to Eritrea Since June 09, 2011.
5. ERO began efforts to ~~execute~~ removal order to Countries other than the one desinated on His removal Order "VIOLATION Court's Order
6. Trying to removing me to countries, I Fear OF MY Life!!!  
Cost Rica, El Salvador, Panama, Ethiopia.
7. Petition has contacted the Eritrean embassies requesting travelers document. Eritrean embassie Orally denied his request For travel document. Petitioner assert that he was denied by the Eritrean consal because he

(2)

## Exhibit B

- is unable to produce document (National identity card Blue Card)

8 on MAY 8 2025 ICE ERO Submitted a TD request to the government OF Eritrea.

9. On June 5, 2025, The Eritrean government denied the request stating they did not have enough information in their database to confirm HAGOS is an Eritrean Citizen.

10 On June 17, 2025 ICE Submitted a travel document request to Ethiopia. I petitioner I NOT citizen of Ethiopia. I claim Fear OF returning to geates enemy To AN ERITREAN. I'm not citizen Ethiopia!

11 petitioner has exhausted any and all administrative remedies to the extent required by Law.

12 The Due process Clause of the Fifth Amendment requires that the deprivation of petitioners Liberty be narrowly tailored to serve compelling government interest. petitioner prays that this Court grant Petitioner!

Date Executed ~~07/21/2025~~ 07/21/2025

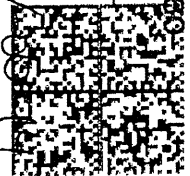
Pro Se Aliula Fantanve Hagos  
Att 

South Texas ICE processing Center  
566 Veterans PR  
Pearsall, TX 78061

Alula Fantaye Hagos A # [REDACTED]  
South TX ICE Processing Cent  
566 Veterans DR  
Pearsall TX 78061

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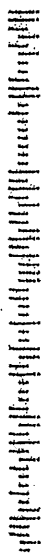
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WESTERN DISTRICT OF TEXAS  
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78207-462999



CLERK US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
862 West Nueva Street  
SAN Antonio, TX 78207