

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NELSON ARIEL UMANOR-CHAVEZ

Petitioner,

v.

NOEM, *et al.*,

Respondents.

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No. 8:25-cv-01634-SAG

RESPONSE TO ORDERS

Respondents profusely apologize to the Court and to Petitioner for failing to timely file its response to the Court’s August 1, 2025, letter order. ECF 20. In response to that order, and to the Court’s order to show cause, ECF 21, Respondents aver as follows:

1. Respondents’ failure to respond to the Court’s letter order was inadvertent. The same week the Court ordered Respondents to submit supplemental briefing “regarding the current status of Mexico’s willingness to accept third country removals” and the status of Petitioner’s case, Respondents submitted a very similar supplemental filing in another immigration habeas case. *See* Response, *Melgar Hernandez v. Baker*, No. 1:25-cv-01663-LKG (D. Md. Aug. 6, 2025), Doc. 23. Undersigned counsel conflated that filing with the filing ordered in the instant case.

2. Undersigned counsel realized this error on August 11, 2025, when the Court entered its order to show cause. ECF 21. The Government is sincerely sorry for this oversight and for the inconvenience it caused the Petitioner and the Court.

3. On August 11, 2025, undersigned counsel contacted Immigration and Customs Enforcement (ICE) to obtain information about the current status of Petitioner’s case. Attached

please find the Declaration of Gerald Edwards, Assistant Field Office Director of the Baltimore Field Office.

4. On May 21, 2025, the Baltimore Field Office submitted a third country removal request for Mexico to ICE Headquarters and USCIS. To date, that request is still pending.

5. On May 28, 2025, the Court extended the Amended Standing Order (ECF 3) enjoining the Respondents from removing the Petitioner from the Continental United States until further order of the Court. ECF 6. ICE will resume efforts to remove the Petitioner to a third country once that Order is vacated.

Dated August 15, 2025

Respectfully Submitted,

Kelly O. Hayes
United States Attorney

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