



Mexico for issuance of a travel document”—was false, because as of that date, all that had occurred was that the ICE Baltimore Field Office had *asked* ICE Headquarters and USCIS to submit a referral to the government of Mexico. And fully three months later, the ICE Baltimore Field Office has not heard any response to that request from ICE Headquarters or from USCIS. The ICE Baltimore Field Office therefore has no information about the status of the request, and Respondents chose not to include a declaration from anyone at ICE Headquarters.

In addition, the Edwards declaration does not contradict the statement in Dkt. No. 19-2 that Mexico is “generally declining to accept third country removals”; and it is non-responsive to this Court’s Order that Respondents provide supplemental briefing regarding “the current status of Mexico’s willingness to accept third country removals[.]”

As to the Court’s Order that Respondent provide supplemental briefing regarding “**all** efforts by the government to remove Petitioner to Mexico or any other third country, and the current status of those efforts” (emphasis added), the Edwards declaration gives no indication that anyone from any branch of the U.S. government has at any time even so much as *communicated* with the government of Mexico regarding whether Mexico would accept Petitioner for removal, much less that the government of Mexico is actively reviewing such request. To the contrary, AFOD Edwards candidly admits that his office does not know, since it has not received a response from ICE Headquarters.

Respectfully submitted,

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**Certificate of Service**

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, along with all attachments thereto, to this Court's CM/ECF case management system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

Respectfully submitted,

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