

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NELSON ARIEL UMANOR-CHAVEZBRYANT *

Petitioner,

v.

NOEM, *et al.*,

Respondents.

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No. 8:25-cv-01634-SAG

RESPONSE TO ORDER

In response to the Court’s August 18, 2025, Order, ECF 24, Respondents aver as follows:

1. As to the “current status of Mexico’s willingness to accept third country removals,” the attached declaration attests that “Mexico is presently accepting certain third country nationals being removed from the United States.” ECF 25-1 at ¶ 6. The declaration further states that “[t]he processing time for removal to Mexico for individuals not subject to a judicial stay is currently less than a week in most cases.” *Id.* at ¶ 7.

2. As to the “active efforts to remove Petitioner to any third country,” Respondents note that this case is subject to the Amended Standing Order, which enjoins and restrains respondents “from removing Petitioners from the continental United States or altering their legal status.” ECF 2, 6. John Schultz, Jr., Deputy Assistant Director of Removal Management, West attests that Immigration and Customs Enforcement “could effectuate [Petitioner’s] removal to Mexico in a matter of days” if the stay is lifted. ECF 25-1 at ¶ 8.

Dated August 25, 2025

Respectfully Submitted,

Kelly O. Hayes
United States Attorney

By: /s/ Molissa H. Farber
Thomas F. Corcoran (Bar No. 24894)
Molissa H. Farber (802255)
Assistant United States Attorney
36 South Charles Street, 4th Floor
Baltimore, Maryland 21201
(410) 209-4800
(410) 962-2310 (fax)
Molissa.Farber@usdoj.gov
Thomas.corcoran@usdoj.gov
Counsel for Respondents