

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division

_____)	
Nelson Ariel Umanzor-Chavez,)	
)	
<i>Petitioner,</i>)	
)	
v.)	Civ. No. <u>8:25-cv-01634-SAG</u>
)	
Kristi Noem, <i>et al.</i> ,)	
)	
<i>Respondents.</i>)	
_____)	

Reply to Response to Orders

Respondents' "Response to Order" filing (Dkt. No. 22), at long last, confirms that over three months later, the government of Mexico has not responded to the Third Country Removal Request submitted on May 21, 2025. Dkt. No. 22-1 at ¶ 5; Dkt. No. 25-1. Yet Respondents' affiant avers 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[.]" Dkt. No. 25-1 at ¶ 7.

There is no reason that the government of Mexico would be *aware* of the judicial stay, since Respondents have not communicated the stay to the government of Mexico (they have not communicated *at all* with the government of Mexico since May 21, Dkt. No. 25-1), nor would the government of Mexico be subject to the stay. Dkt. No. 6. To be clear, the stay did not restrain Respondents from communicating with the government of Mexico to ensure the issuance of travel documents, it merely restrained them from "removing Petitioner Nelson Ariel Umanzor Chavez from the continental United States or altering his legal status." *Id.*

In sum: over three months ago, Respondents requested travel documents from Mexico; Mexico has yet to reply; the process usually takes less than a week. Respondents have not given

this Court any reason to believe that there is a significant likelihood of removal in the reasonably foreseeable future for *this individual Petitioner* (as opposed to, noncitizens generally). Meanwhile, the additional post-removal-period 90 days recognized by the Supreme Court in *Zadvydas* has run. The writ of habeas corpus should issue.

Respectfully submitted,

//s// Simon Sandoval-Moshenberg
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Date: August 26, 2025

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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Date: August 26, 2025