

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

ISRAEL ADONAY SAGASTIZADO
SANCHEZ,

Petitioner,

v.

KRISTI NOEM, ET AL.,

Respondents.

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CIVIL ACTION NO. 5:25-CV-104

**RESPONDENTS' ADVISORY REGARDING
PETITIONER'S ANTICIPATED REMOVAL FROM THE UNITED STATES**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW the Respondents, Kristi Noem, Secretary of the U.S. Department of Homeland Security, Todd Lyons, Acting Director of U.S. Immigration and Customs Enforcement (ICE), Daniel Bible, San Antonio Field Office Director for ICE, Pamela Bondi, Attorney General of the United States, and the unnamed Warden of the Webb County Detention Center, Respondents, in their official capacities, by and through the United States Attorney for the Southern District of Texas, and hereby file their Advisory to the Court regarding Petitioner's Anticipated Removal from the United States:

1) On June 25, 2025, Petitioner Israel Adonay Sagastizado Sanchez (Sagastizado) filed a Petition for Writ of Habeas Corpus (Petition), seeking his release from ICE custody at the Webb County Detention Center in Laredo, Texas, where he was detained pending removal from the United States. Through his petition, Sagastizado alleges that he is a citizen of El Salvador, who was granted withholding of Removal to El Salvador by an Immigration Judge, and that he

was later taken into custody by ICE for purposes of removing him from the United States to Mexico. Sagastizado characterizes his continued immigration detention as illegal.

2) On August 20, 2025, this Court issued an Order which granted Petitioner's Unopposed Motion to Suspend Briefing Deadline Pending Adjudication of Petitioner's Motion for Leave to Serve Document Request. Included in the last paragraph of said Order was the following directive: "...Respondents must notify Petitioner's counsel and the Court of any anticipated or planned transfer of Sagastizado outside of the Southern District of Texas **at least five (5) days before** any such transfer".

3) Respondents hereby notify the Court and Petitioner's counsel that Sagastizado is scheduled to be removed from the United States to Mexico on September 12, 2025, through a port of entry. Sagastizado will be escorted to the port of entry and will be allowed to enter Mexico on foot.

Respectfully submitted,

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **RESPONDENT'S ADVISORY REGARDING PETITIONER'S ANTICIPATED REMOVAL FROM THE UNITED STATES** in the case of **ISRAEL ADONAY SAGASTIZADO SANCHEZ v. KRISI NOEM, ET AL**, Civil Action Number 5:25-CV-104, was sent to Simon Y. Sandoval-Moshenberg, Murray Osorio PLLC, 4103 Chain Bridge Road, Suite 300, Fairfax, Virginia 22030, by electronic mail through the District Clerk's electronic case filing system, on this the 8th day of September, 2025.