

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

TOUNI GHAMELIAN

Petitioner,

v.

NIKITA BAKER, et al.,

Respondents.

NOTICE OF SUPPLEMENTAL
AUTHORITY

Case No. 1:25-02106-SAG

NOTICE OF SUPPLEMENTAL AUTHORITY

Petitioner (“Mr. Ghamelian”) respectfully submits the attached transcript of Judge Russell’s oral decision in *Cordon-Salguero v. Noem*, 25-cv-01626-GLR (D. Md. Jun. 18, 2025), as Supplemental Authority in support of his Petition for Writ of Habeas Corpus.¹ In *Cordon-Salguero*, Judge Russell ordered the release of a Guatemalan whom U.S. Immigration and Customs Enforcement (“ICE”) detained in an attempt to remove him to Mexico.² Like Mr. Ghamelian, Cordon-Salguero complied with an order of supervision for years without incident. *Id.* at 28; *see also* Dkt. 12-3 (Order of Supervision and Reporting Record). Although Cordon-Salguero had only been detained for one month when Judge Russell ruled on his habeas petition, the court determined that the presumptively reasonable detention period expired when he was released from custody in 2018, following conclusion of his removal proceedings, and placed on an order of supervision. *Id.* at 33; *compare* Dkt. 12-3. ICE’s unsupported claims that Cordon-Salguero’s case was “under

¹ Undersigned counsel received a copy of the transcript following the hearing the Court conducted in this case on July 16, 2025.

² The petitioner in *Cordon-Salguero* voluntarily dismissed his claims challenging the procedures employed to remove him to a third country due to the pending litigation in *D.V.D. v. DHS*, ___ F. Supp. 3d ___, No. 25-10676, 2025 WL 1142968 (D. Mass. Apr. 18, 2025). Petitioner’s case is distinct in that Respondents are attempting to remove him to Spain and Iran, two countries which were designated in his final order of removal, as well as Mexico, a third country never designated in removal proceedings.

current review by the Government of Mexico for issuance of a travel document”—the same claims Respondents make in Mr. Ghamelian’s case—failed to establish that Cordon-Salguero’s removal was significantly likely in the reasonably foreseeable future. *Id.* at 35; *compare* Dkt. 8-9 (Notice of Revocation).³

Date: July 17, 2025

Respectfully submitted,

/s/ Kelly Catherine Walker, Esq.

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³ The court further found that ICE failed to comply with 8 C.F.R. 241.4(l) because Notice of Revocation was signed by someone “who is unknown to the officer in the court at this time . . . with no proof of any delegated authority to do so. It was signed by a deportation officer for Respondent Nikita Baker[.]” *Id.* at 36; *compare* Dkt. 8-9 (Notice of Revocation containing signature of unknown person “for” Nikita Baker).

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Kelly Catherine Walker
Kelly Catherine Walker