

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

Peymon Haidari,

No. 3:25-cv-00250 - LS

Plaintiff,

Kristi Noem, Secretary of Homeland Security; Todd M. Lyons, Acting Director of Immigration and Customs Enforcement; Mary De Anda-Ybarra, El Paso ICE Field Office Director; ICE Facility Administrator (name currently unknown) at El Paso Service Processing Center.

Defendants.

PETITIONER'S NOTICE REGARDING TRAVEL DOCUMENT

Petitioner, by and through undersigned counsel, respectfully notifies the Court of the following update concerning his travel document:

1. On or around August 26, 2025, Petitioner was interviewed telephonically by a representative of the Interests Section of the Islamic Republic of Iran. At the conclusion of the interview, the representative orally informed Petitioner that a travel document would not be issued.
2. As the Iranian government has declined to issue a travel document, the Petitioner's removal to Iran is not reasonably foreseeable.
3. The parties have discussed this briefly, but Federal Respondents have been unable to confirm or deny the specific information as of the time of this filing. Government systems as of August 29, 2025, show that the travel document request remains pending with the Iranian government.

CONCLUSION

Petitioner respectfully submits that his continued detention lacks a significant likelihood of removal in the reasonably foreseeable future, and therefore, the Court should grant the writ of habeas corpus.

Respectfully submitted,

August 29, 2025

/s/ Lance Curtright
Lance Curtright
Texas Bar No. 24032109
De Mott, Curtright, Armendariz, LLP
8023 Vantage Dr., Ste. 800
San Antonio, Texas 78230
Tel: (210) 590-1844
Fax: (210) 212-2116
lance@dmcausa.com

/s/ Alejandra Martinez
Alejandra Martinez
Texas Bar No. 24096346
De Mott, Curtright, Armendariz, LLP
8023 Vantage Dr., Ste. 800
San Antonio, Texas 78230
Tel: (210) 590-1844
Fax: (210) 212-2116
alejandra.martinez@dmcausa.com

CERTIFICATE OF SERVICE

I certify that on today's date, August 29, 2025, I electronically filed the above notice by using the Court's CM/ECF system which will automatically send a notice of electronic filing to Defendants' counsel.

/s/Alejandra Martinez
Alejandra Martinez