

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

<b>FRICO JEAN (A )</b> ,	)	<b>Case No. 6:25-cv-00970-JDC-DJA</b>
	)	
<b>VERSUS</b>	)	<b>Judge James D. Cain, Jr.</b>
	)	
<b>BRYAN PATTERSON, et al</b>	)	<b>Magistrate Judge Ayo</b>

**PETITIONER’S MOTION FOR STATUS CONFERENCE**

Petitioner FRICO JEAN, by and through his attorneys of record files this Motion to request that the Court hold a status conference concerning his return to the United States, and in support thereof states as follows.

This Honorable Court issued a temporary restraining order on July 16, 2025, restraining Immigration & Customs Enforcement (ICE) from removing Petitioner FRICO JEAN from the state of Louisiana. (Doc. 11). On August 12, 2025, ICE violated the court’s order by removing Petitioner from the United States to Haiti. ICE has admitted its mistake. (Doc. 29).

On August 14, 2025, Petitioner filed a Motion to Hold ICE in Contempt of Court. (Doc. 23).

On the afternoon of August 15, 2025, the New Orleans Field Office of ICE reached out to Petitioner’s attorney, the undersigned, to advise that they would return Petitioner to the United States on parole. On August 21, 2025, the office advised that Petitioner would need to provide a passport. Though Petitioner was in possession of a valid Haitian passport at the time ICE detained him, ICE had provided it to the government of Haiti to permit his removal. Therefore, Petitioner was required to apply to the government of Haiti for a new passport. On September 2, 2025, Petitioner, through counsel, provided a copy of his newly issued passport to ICE.

In the following weeks, Petitioner's counsel has continued to attempt to communicate with ICE to learn the status of Petitioner's return. On September 11, 2025, ICE indicated it was in the process of scheduling the return and asked for contact information for Petitioner, which counsel provided.

Since his return to Haiti, Petitioner had been staying with a cousin in a neighborhood of Port-au-Prince. Haiti faces expanding gang violence and a complete lack of state ability to protect civilians from that violence, according to the U.S. Department of State. *See* 2024 State Department Report on Human Rights Practices, *available at* <https://www.state.gov/reports/2024-country-reports-on-human-rights-practices/haiti/> (last accessed Oct. 4, 2025). High rates of gang violence result in civilian deaths, widespread displacement, and the destruction of homes and property. *Id.* Criminal groups are so pervasive that they bring public services to a standstill, including electricity, water supply, sanitation, health care and transportation. *See* Human Rights Watch World Report, 2025, *available at* <https://www.hrw.org/world-report/2025/country-chapters/haiti> (last accessed Oct. 4, 2025). Over half the population struggles daily to afford food. *Id.* On or about September 12, 2025, criminal gangs entered Petitioner's cousin's neighborhood and started shooting indiscriminately. Mr. Jean fled for his life; his cousin was shot and seriously injured. Mr. Jean is currently seeking safety in the Dominican Republic.

Since that date, undersigned counsel advised ICE of the dangers Petitioner faces and has repeatedly requested the status of his return; in response to repeated inquiries, ICE states only that they will advise when they have an update as to his return on advance parole. The agency has provided no other information.

Given the dearth of information provided by ICE, Petitioner reached out to Assistant U.S. Attorney Karen King, who was able to learn that Enforcement and Removal Operations, the sub-

office of ICE who removed Petitioner and with whom Petitioner was communicating, was waiting on Homeland Security Investigations, another sub-office of ICE, to confirm a flight. She was not given additional information about timing.

It has now been almost eight weeks since ICE removed Petitioner in violation of this Court's order, and they indicated they would return him to the United States on advance parole. Petitioner's safety is in danger in Haiti. Petitioner still does not have a date for return.

This Court denied Petitioner's Motion to Hold ICE in Contempt of Court in part due to the agency's commitment to return Petitioner to the United States upon issuance of a valid travel document. (Doc. 30).

Petitioner therefore requests a status hearing before the Court, and a regular schedule of reporting, to ensure ICE meets its commitment to return Petitioner to the United States on advance parole upon issuance of the travel document.

The undersigned reached out to Assistant Chief Counsel Karen King via email prior to filing the request to determine Respondents' stance but received her out-of-office auto-reply. A number for the Civil Chief was provided in the email; the undersigned also called and left a voicemail. No response has been received.

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

- A. Schedule a status conference to require ICE to report its efforts and timeline for Petitioner's return to the United States;
- B. Schedule such regular status hearings or reports as may be necessary to assure Petitioner's timely return to the United States on parole;
- C. Order such other relief as is equitable and just.

Dated: October 6, 2025

Respectfully Submitted,  
Petitioner Frico Jean  
By: /s/ Erin C. Cobb  
Erin C. Cobb  
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ATTORNEYS FOR FRICO JEAN

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2025, I electronically filed the foregoing with the clerk of court by using the CM/ECF system, which will send a notice of electronic filing to counsel for Respondents, as counsel for Respondents is an electronic filer with the court. I also provided a courtesy copy of this motion to counsel for Respondents prior to filing it with the CM/ECF system.

*/s/ Erin C. Cobb* \_\_\_\_\_  
Erin C. Cobb  
Krizelman Burton & Associates, LLC