

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 25-CV-23131-ALTONAGA

SAMIR ABUELHAJ,
a/k/a/ Samir Ahmed Zaiid Mohammed

Petitioner,
v.

KROME IMMIGRATION DETENTION CENTER,
Respondent.

RESPONDENT'S RESPONSE TO COURT ORDER

Respondent, the Krome Immigration Detention Center, by and through the undersigned Assistant United States Attorney, respectfully submits this Response to this Court's Order (ECF No. 15), ordering Respondent "to submit a memorandum . . . stating whether Petitioner remains in ICE custody and, if not, whether his release renders this case moot."

Respondent submits the attached declaration which states, in part, that:

1. On or about August 14, 2025, ICE received Petitioner's travel document for his removal to Jordan.
2. On or about September 6, 2025, Petitioner was released from Krome for removal, but the flight was diverted due to weather conditions. Petitioner missed his connecting flight to Jordan.
3. On or about September 7, 2025, Petitioner was returned to Krome, where he is currently detained.

4. On or about September 18, 2025, ICE submitted a travel document request package to the Embassy of Jordan for a new travel document, as the previous travel document had expired.
5. Upon receipt of a new travel document, ERO will immediately reschedule Petitioner's removal to Jordan.

Respondent maintains that there is a significant likelihood of Petitioner's removal in the reasonably foreseeable future because Jordan recognizes Petitioner's citizenship and previously issued a travel document for his removal. That said, Petitioner is currently in custody, and this case is not yet moot.

Respectfully submitted,

JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY

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Counsel for Respondent

CERTIFICATE OF SERVICE

I certify that on October 15, 2025, I uploaded the attached document to the Court's PACER system. Moreover, I certify that a copy with exhibits was mailed to:

SAMIR ABUELHAJ A. [REDACTED]
KROME Service Processing Center – Inmate Mail
18201 SW 17th Street
Miami, FL 33194

By: /s/ H. Ron Davidson
H. Ron Davidson
Assistant United States Attorney