

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.

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**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. 17), ordering Respondent to tell the Court "whether Petitioner remains in custody and, if so, the reasonable likelihood of his removal in the immediate future."

In support of this Response, Respondent submits the Declaration of Deportation Office Jean Josil.

Respectfully submitted,

**JASON A. REDING QUIÑONES**  
**UNITED STATES ATTORNEY**

By: **H. Ron Davidson**  
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*Counsel for Respondents*

**CERTIFICATE OF SERVICE**

I certify that on November 18, 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 17<sup>th</sup> Street  
Miami, FL 33194

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