

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 0:25-cv-02926-PJS-SGE

TOU PAO LEE,

Petitioner,

v.

PAMELA BONDI et al.,

Respondents.

**FEDERAL RESPONDENTS'
SUPPLEMENTAL RESPONSE TO
PETITION FOR WRIT OF
HABEAS CORPUS AND
OPPOSITION TO MOTION FOR
TEMPORARY RESTRAINING
ORDER**

Federal Respondents submit this supplemental response to provide the Court with new information obtained since the Federal Respondents' original Response to Petition for Writ of Habeas Corpus and Opposition to Motion for Temporary Restraining Order filed on August 1, 2025 (ECF No. 19) and the Declaration of John D. Ligon with exhibits thereto also filed on August 1, 2025 (ECF No. 20).

Specifically, ICE ERO has now received a travel document for Petitioner Tou Pao Lee and ICE has scheduled his removal to occur within 10 days. Declaration of John D. Ligon dated August 5, 2025, ¶ 5. Thus, not only is Lee's removal reasonably foreseeable, it is imminent. ICE officials are working to stage and then remove Lee from the country. These facts were conveyed to Petitioner's counsel on Wednesday, August 6, 2025. Because Lee's removal is imminent, there is no basis for the court to grant any habeas relief or any injunctive relief for all the reasons set forth in Federal Respondents original return. See ECF Nos. 19 and 20.

Therefore, the Federal Respondents respectfully request that the Court issue an Order as follows:

1. That the Petition for Writ of Habeas Corpus (ECF No. 1) be denied;
2. That the Order dated July 23, 2025 (ECF no. 18) be dissolved;
3. That Petitioner's Emergency Motion for Temporary Restraining Order (ECF No. 9) be denied.

Federal Respondents respectfully request that the Court take this action immediately so that ICE may continue its ongoing efforts to remove Petitioner Lee from the United States pursuant to the final order of removal. *See Vue v. Mchenry et. al.*, No. 25-2827 (PAM/DLM) (D. Minn. filed July 11, 2025); *Ahmed v. Brott*, 2015 U.S. Dist. LEXIS 45346, at *15 (D. Minn. Mar. 17, 2015).

CONCLUSION

The Federal Respondents respectfully request that the Court deny Lee's habeas petition and accompanying motion for a temporary restraining order. No evidentiary hearing is necessary in this matter because the submissions filed herewith and previously provide a sufficient record upon which the Court can adjudicate the petition and deny the TRO.

Dated: August 7, 2025

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