

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

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REZA YAGHOUBI YEGANEH,

Petitioner.

v.

WARDEN, BLUEBONNET DETENTION  
FACILITY, et al.

Respondent.

Civil Action No. 1:25-CV-00121-H

**NOTICE REGARDING TRAVEL DOCUMENTS**

On August 26, 2025, the Court ordered respondents to file a sur-reply to Petitioner's reply wherein Petitioner alleges that Iran denied the request for travel documents on August 25, 2025. Respondents filed a Sur-Reply on September 5, 2025, detailing the status of Petitioner's travel documents. On September 10, 2025, Respondents were notified by the government of Iran that Petitioner's travel document request had been denied. (*See Exhibit A*).

There remains a significant likelihood Petitioner will be removed in the reasonably foreseeable future. Respondents are pursuing the possibility of a third-country removal.

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DETENTION FACILITY, et al.,

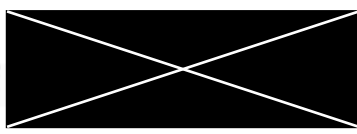
Respondents.

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Case No. 1:25-CV-121-H

DECLARATION OF RYAN J. LANKFORD

In accordance with the provisions of Section 1746 of Title 28, United States Code, I, the undersigned, Ryan J. Lankford, do hereby make the following declaration, under penalty of perjury in the above-styled and numbered cause:

1. I, Ryan J. Lankford, am presently employed by the United States Department of Homeland Security, Immigration and Customs Enforcement (“DHS”), in the position of Deportation Officer for Enforcement Removal Operations (“ERO”).
2. I was the Deportation Officer assigned to the case of Reza YAGHOUBI YEGANEH, alien file number  a native and citizen of Iran.
3. On September 4, 2025, I submitted a declaration stating I had not received any communication from Iranian officials that they had denied or would deny ERO’s travel document request. On September 10, 2025, I received Iran’s denial of the travel document request.

4. ERO will likely now pursue the possibility of third-country removal.

Sworn to and subscribed this 14th day of September, 2025.

**RYAN J**

**LANKFORD**

Digitally signed by  
RYAN J LANKFORD  
Date: 2025.09.14  
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Ryan J. Lankford  
Deportation Officer  
Department of Homeland Security  
Immigration and Customs Enforcement