

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

SAHAND YOUSEFI NASRABADI,

Petitioner,

v.

MARCELLO VILLEGAS, et al.,

Respondent.

Civil Action No. 1:25-CV-00129-H

NOTICE

In accordance with the July 30, 2025, Order of this Court, the Respondents advise the Court that the Dallas Field office for Enforcement and Removal Operations is working on Petitioner's removal and will continue to do so pending the resolution of the Petitioner's writ of habeas corpus and request for injunctive relief. If Respondents obtain removal documents before this litigation concludes, it will provide Petitioner's counsel and the Court with at least three days' notice before executing any removal of Petitioner from the United States.

With respect to the issue of what notice might be provided before moving Petitioner out of the Northern District of Texas (but still within the United States), Respondents respectfully submit that no such notice is necessary or should be required. ICE routinely may need to move detainees between and among facilities due to capacity limitations and other operational issues, but any such move of Petitioner, even if to a facility in another

district, would not affect this Court's jurisdiction over this case or the continuing availability of venue. *See Smith v. Fleming*, No. 4:02-CV-440-Y, 2002 WL 31114021, at *2 (N.D. Tex. Sept. 20, 2002) ("It is well established that jurisdiction over the petitioner attaches with the initial filing for habeas corpus relief, and it is not destroyed by a transfer of the petitioner and the accompanying custodial change"); *see also Moler v. Wells*, 18 F.4th 162, 166 n.7 (5th Cir. 2021) (explaining that "'venue [is] determined at the outset of litigation and [is] not affected by subsequent events'").

Respectfully submitted,

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CERTIFICATE OF SERVICE

On August 4, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Ann E. Cruce-Haag
ANN E. CRUCE-HAAG
Assistant United States Attorney