
MURAD LADAK,

Petitioner,

v.

KRISTI NOEM, et al.,

Respondents.

Civil Action No. 1:25-CV-00194-H

SUPPLEMENTAL RESPONSE

On December 8, 2025, the Court ordered Respondents to file a response addressing 1) whether ICE is pursuing third-country removal; 2) and if so, what steps ICE has taken or will take to facilitate Petitioner's removal to a third-country. In response thereto, Respondents would show the Court as follows:

As an initial matter, Respondents did not intend to be ambiguous or contradictory in addressing the possibility of a third-country removal in this case in their response and supplemental response, and apologizes for doing so. As this Court and Plaintiff are aware, matters of foreign policy can be difficult, and they influence how ICE proceeds in removing each alien. The very nature of the process, including how and when different countries act in response to requests made by the United States, ongoing diplomatic negotiations, etc., inject a certain amount of uncertainty into this process. It is Respondents' intentions to relay the status of each alien with as much clarity as possible, and again, Respondents apologize insofar as they failed to meet that standard here.

A. ICE is not currently pursuing third-country removal, because Petitioner's travel papers have not been denied by Pakistan.

Respondents are not pursuing third-country removal. Despite Petitioner's statements to the contrary, Respondents' position has remained the same--Respondents are working to remove Petitioner to Pakistan and will continue working on removal to Pakistan because there is a high likelihood travel papers will be issued by Pakistan. *See Exhibit A.*

Petitioner claims the travel request to Pakistan has been denied, but that is untrue. Pakistan has asked for additional documents; those documents have been gathered, including parental a-files, and are being sent to the Consulate General of Pakistan. *Id.* At no time did Pakistan deny the travel request. Respondent continues to await the decision of the Pakistani government and when Pakistan grants the document, as is anticipated, Petitioner will be removed to Pakistan.

B. ICE has not taken any steps to facilitate third-country removal, but will provide Petitioner with notice if that changes.

As noted, Respondents continue to engage in continuing efforts to effectuate Petitioner's removal to Pakistan. As such, no steps have been taken to facilitate Petitioner's removal a third-country. ERO does not consider or attempt to facilitate removal to third countries until removal to the country designated in the removal order is impossible or impracticable. Then the process of facilitating removal to a third-country begins. If, and only if, Pakistan denies the travel document, ERO will consider third-country removal in this case.

RYAN RAYBOULD
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/s/ Ann E. Cruce-Haag
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Attorneys for Respondent

CERTIFICATE OF SERVICE

On December 10, 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

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

MURAD LADAK,

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v.

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Cause No. 1:25-CV-194-H

DECLARATION OF MICHEAL L. THOMPSON

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

1. I, Micheal L. Thompson, 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. My duties as a Deportation Officer include: (1) arresting aliens who are removable from the United States; (2) processing aliens who will be removed from the United States or placed into removal proceedings before an immigration judge; (3) monitoring aliens' cases until removal; (4) responding to aliens' requests while in ICE custody; and (5) requesting travel documents and coordinating travel for aliens ordered removed from the United States. My duties may, at times, include other responsibilities related to the apprehension, arrest, and removal of aliens, as needed.

3. I am familiar with the case of Murad LADAK ("Ladak"), alien file number  a native and citizen of Pakistan. The following information is based on my personal knowledge, information obtained from government databases maintained by DHS, and other documents related to this case.
4. Since the last signed affidavit on October 16, 2025, the following steps have been taken by ERO.
5. On October 16, 2025, ERO sent the Travel Document Request ("TDR") package to the Consulate General of Pakistan, Houston, which included a copy of his Pakistani birth certificate.
6. On November 25, 2025, ERO requested an update on the TDR status.
7. On December 2, 2025, ERO received an update from the Consulate General of Pakistan, Houston stating that they are unable to verify Ladak's Pakistan nationality. The Consulate General of Pakistan requested names and phone numbers as well as addresses for any relatives or friends of Ladak in Pakistan. The Consulate General of Pakistan also requested any further identity documents for Ladak and his family members.
8. On December 3, 2025, ERO officers spoke with Ladak, and Ladak advised that his parents brought him from Pakistan when he was less than a year old, so Ladak does not have any additional identification documents to provide.
9. I have ordered Ladak's parents' files in an effort to gather more documents that can be used towards Ladak's TDR.
10. I personally have not seen Pakistan denying any TDRs. Due to the recent government shutdown spanning October 1, 2025 to November 12, 2025, ICE ERO was backlogged on obtaining money orders for the issuance of travel documents. ERO Mission Support is

now able to provide ERO officers with the money orders needed to get travel documents issued, and we are actively working on the money orders from the month of October 2025.

11. Since we are now able to issue money orders, and we have a copy of a birth certificate for Ladak, I believe he can be removed in the reasonably foreseeable future.

Sworn to and subscribed this 9th day of December, 2025

**MICHEAL L
THOMPSON** Digitally signed by
MICHEAL L THOMPSON
Date: 2025.12.09
14:32:52 -06'00'

Micheal L. Thompson
Deportation Officer
Department of Homeland Security
Immigration and Customs Enforcement