

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

Heithem Mohammad ABDUL KHALIQ)

Petitioner,)

v.)

KRISTI NOEM, et al.)

Respondents.)

Case No. CIV-25-1154-PRW

Immigration File No.

A 

**PETITIONER’S SUPPLEMENTAL BREIFING IN SUPPORT OF WRIT OF
HABEAS CORPUS**

Petitioner, by and through his undersigned counsel, hereby submits this Supplemental Brief pursuant to the Court’s November 4, 2025, Order. Doc. 15. Petitioner has now been in custody on his most recent detention for 249 days and Respondents still have not procured travel documents. He was previously detained by ICE for 837 days – 390 of which were after the final order of removal, meaning that they detained him for 300 days beyond the ninety-day period afforded to ICE under 8 U.S.C. § 1231(a)(1). Total detention time beyond the ninety-day period now totals 549 days.¹

The Court’s order for supplemental briefing states that several issues were resolved at the November 3, 2025, status conference, and directs the parties to address

¹ The Appeal dismissal was February 20, 2020. The Motion to Reopen Denial was July 16, 2020. Arguably the 90 days start on February 20, 2020. The 300 days from the first detention added to the current 249 days equals 549 days, or 1.5 years.

certain remaining factual discrepancies. Petitioner understands that he is ordered to respond to the Jordanian Passport issue and the Purported refusal to sign travel documents issue. Petitioner addresses those as follows:

1. Petitioner's purported Jordanian Passport.

At the November 3, 2025, status conference, counsel for Respondents produced a copy of what appears to be an expired Jordanian passport along with an Immigrant Visa Alien Registration form noting immigrant visa issuance from the U.S. Embassy in Aman, Jordan on May 24, 1990. On November 4, 2025, counsel for Petitioner conducted a previously scheduled phone visitation with Petitioner. Counsel told Petitioner that the government agency produced an expired passport from Jordan with a photo and all relevant biographical information relating to Petitioner. Petitioner stated that he does not remember a passport but that his parents always handled immigration matters. (Note that Petitioner was 16 years old at the time of Immigrant Visa issuance). When asked if he had a current Jordanian passport, he stated he did not believe that he does. When asked if he *ever* had a Jordanian passport, even if expired, he repeated that he did not remember one. Counsel's associate attempted to schedule an in-person visitation with Petitioner to show him the passport and visa directly,² but requests for visitation were unsuccessful prior to the deadline on briefing.³ Note that he previously admitted that ICE agents showed him a copy of a passport and that he also stated he did not remember having one.⁴

² Exhibit 1, Affidavit from Cassidy Walsh, Associate attorney at Kelli J Stump, PLLC.

³ On November 7, 2025, counsel reached out to opposing counsel in attempts to facilitate visitation. The facility reached out and stated they cannot accommodate in-person visitation until November 11 or November 12, 2025 – past the deadline of this brief.

⁴ Reply Brief, Exhibit 1, Doc 12-1 ¶ 14.

Counsel for Petitioner met with Petitioner's older sister, Laila Ghamrawi, on November 5, 2025. She confirmed the photos were Petitioner and remembered that Petitioner did have to depart the country and return as a resident, but she did not recall the specific details. Nonetheless, the copy of the passport and the visa registration appear valid on their face. While Petitioner cannot confirm he had a Jordanian passport, he does not currently dispute it based on review of the copy by counsel and his sister. The fact that he does not dispute it, however, does not mitigate the fact that Respondents have not been able to renew the expired passport and obtain travel documents to Jordan since 2021.

2. Petitioner's purported refusal to sign travel documents.

Petitioner asserts that he has always complied with ICE agents' requests when he can understand them. At one point he was presented with a "Power of Attorney" and asked Respondents if he could have counsel review it. Counsel for Petitioner submitted a G-28, Notice of Entry of Appearance, to Respondents on October 6, 2025, asking to review the purported Power of Attorney document because Petitioner did not know what it was or how to complete it.⁵ On October 16, 2025, Counsel for Petitioner reached out again because Respondents had told Petitioner they had not received the G-28 and to resend, also copying the Dallas ICE Office.⁶ Counsel sent the email again, copying Dallas ICE and also copied the Cimarron Detention Facility, ran by CoreCivic. Officer Adkisson with CoreCivic responded that he printed it off and gave to an ICE officer who

⁵ Exhibit 2, Email correspondence, page 5.

⁶ *Id.* at 4

was “ getting it scanned in.”⁷ Officer Adkisson later emailed the document to counsel.⁸

The document was presented completely blank for Petitioner to complete. He did not know how to complete it and wrote current counsel’s name (misspelled) in the blanks, but he *did* sign it, and it is dated September 30, 2025. He told counsel Respondents did not explain it to him or how to complete it and that is why he wanted to speak with counsel. After a review of the document, it appears that a government official’s name should be substituted where current counsel’s name is. On November 5, 2025, counsel for Petitioner forwarded the document and email communication to opposing counsel explaining the situation and asked whether the document needs to be re-executed and that Petitioner will comply, noting that he does not have a legal education and that the document is confusing. Opposing counsel replied that Respondents would be taking Petitioner a new document to complete.

Petitioner argues that his failure to understand the document and completing it incorrectly is not a refusal to comply with his removal. Further, removal to Palestinian territory is speculative. Counsel has scoured the internet and resources researching recent removals to the West Bank and cannot find anything. Respondents have not shown any communications with Israel, no formal agreements with Israel, or any travel documents. Thus, they have not demonstrated there is a significant likelihood of removal in the reasonably foreseeable future to warrant detention.

Conclusion

Because Petitioner’s removal is not reasonably foreseeable, his detention does

⁷ *Id.* at 3

⁸ *Id.* at 2, *see also* Exhibit 3, Power of Attorney.

not effectuate the purpose of the statute and is accordingly not authorized by 8 U.S.C. § 1231(a). He has always complied with alternatives to detention on his release and will continue to do so when not incarcerated. Consequently, he respectfully asks this court to order his release from detention.

Respectfully submitted,

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Dated: November 10, 2025

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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