

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI**

IBRAHIMA CAMARA,

Petitioner,

vs.

KEVIN RAYCRAFT,¹ Field Office Director
for Enforcement and Removal Operations,
United States Immigration and Customs
Enforcement.

Respondent.

Case No. 1:25-cv-740

District Judge Jeffrey P. Hopkins

Magistrate Judge Peter B. Silvain, Jr.

EMERGENCY MOTION TO ENFORCE

Petitioner, Mr. Ibrahima Camara, by and through undersigned Counsel, respectfully submits this Emergency Motion to Enforce.

1. On March 19, 2026, the Honorable Judge Hopkins granted Mr. Camara's habeas petition on multiple grounds. First, the court determined that it had jurisdiction to hear the petition. Second, the court found that ICE failed to comply with applicable regulations when re-detaining Mr. Camara. Third, the court concluded that due process prohibits the indefinite detention of removable noncitizens and, under the circumstances, Mr. Camara's removal is no longer reasonably foreseeable. As a result, his continued detention by ICE is not sustainable under the Supreme Court's precedent in *Zadvydas*. See *Masheli*, 2026 WL 177591, at *3; *Munoz-Saucedo*, 789 F. Supp. 3d at 397. The court further ordered the

¹ Robert K. Lynch is no longer the Field Office Director for ERO, ICE. Kevin Raycraft is currently the Acting Field Office Director for ERO, ICE.

Respondent to immediately release the Petitioner from custody, subject to his existing Order of Supervision, and to certify compliance by filing notice on the docket no later than one day after the entry of the Order.

2. The Respondent initially complied with the order, and filed a notice to the court (Notice, ECF 15., PageId 153). However, thought this notice, the Respondent indicated that ICE still intended to deport Mr. Camara on March 29, 2026, via a non-commercial flight.
3. Following this notice, on March 22, 2026, the court acknowledged the government's notice claiming that Mr. Camara is scheduled for removal to Mauritania and requesting that the prior "Do Not Remove" order be lifted. However, the judge did not immediately grant that request and instead set an expedited briefing schedule, requiring Mr. Camara to respond by March 24, 2026, and the government to reply by March 26, 2026. The court expressed significant concern about whether Mr. Camara's removal is actually feasible. The court noted conflicting evidence about travel documents. specifically, that Mauritania previously required a "Judgment of Parentage" before issuing travel documents, and there is no clear evidence that this requirement has been satisfied or waived. To determine whether removal is reasonably foreseeable, the court ordered the government to provide detailed evidence by March 26, 2026, including proof of valid travel documents (or an explanation if none exist), updates on efforts to obtain them, clarification on how removal would occur without traditional documents, and a plan if Mauritania refuses to accept Mr. Camara.
4. The Petitioner hereby notifies the Court of the Respondent's noncompliance with the Court's Order and respectfully moves for enforcement of the judgment and the imposition of sanctions.

5. On March 23, 2026, the Respondent re-detained the Petitioner despite the Court's Order granting habeas relief and despite the Court's express indication that additional documentation was necessary to determine whether removal was reasonably foreseeable. The Respondent re-detained the Petitioner without producing the evidence required under the Court's March 22, 2026, Order, in violation of that Order.
6. The Respondent further violated the Court's Order by failing to restore Petitioner to his prior conditions of supervision upon release. The Court expressly ordered that Petitioner be released "subject to his preexisting Order of Supervision." Instead of complying, Respondent re-detained Petitioner and did not reinstate those supervision conditions, effectively nullifying the relief granted by the Court. This failure constitutes an independent violation of the Court's Order, as Respondent was not granted discretion to alter, delay, or disregard the terms of release. By refusing to restore Petitioner to supervision, Respondent has continued to act in direct contravention of the Court's clear and unambiguous directive.
7. On March 23, 2026, undersigned counsel contacted opposing counsel. Opposing counsel asserted that the Court no longer has jurisdiction and, on that basis, claimed that Respondent is not required to maintain Petitioner within the district and is permitted to re-detain him.
8. The Respondent has improperly assumed the role of the Court by unilaterally determining that the Court's Order no longer applies and that Petitioner's removal is reasonably foreseeable. These determinations are exclusively within the province of the Court, not the Respondent or its counsel. The Court explicitly retained authority over this issue and ordered the Respondent to produce additional documentation to allow the Court to assess

whether removal is reasonably foreseeable. Instead of complying with that directive, the Respondent bypassed the Court's authority, substituted its own judgment, and acted in direct contravention of the Court's Order. Such conduct undermines the integrity of judicial review, disregards the Court's clear instructions, and constitutes a serious violation warranting immediate corrective action and sanctions.

9. The Petitioner respectfully requests that the Court issue an emergency order directing the immediate release of the Petitioner from government custody. The Petitioner respectfully requests that the Court maintain its Do Not Remove Order and prohibit the Respondent from detaining, transferring, or removing Mr. Camara.
10. The Petitioner further requests that the Court schedule an immediate show cause hearing and impose sanctions on the Respondent and opposing counsel for violation of a federal court order.

Respectfully submitted,

Dated: March 23, 2026

s/ Julie Nemecek

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