

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

IBRAHIMA CAMARA,

Petitioner,

v.

Field Office Director for Enforcement and  
Removal Operations, United States  
Immigration and Customs Enforcement,

Respondent.

Case No. 1:25-cv-00740

District Judge Jeffery P. Hopkins

Magistrate Judge Peter B. Silvain, Jr.

---

**RESPONSE TO COURT'S MARCH 22, 2026 NOTATION ORDER**

---

Respondent hereby submits its Response to this Court's March 22, 2026 Notation Order. Camara's removal to Mauritania is reasonably foreseeable because he is scheduled to be removed to Mauritania on March 29, 2026. As a result, Respondent respectfully requests that this Court lift its Do Not Remove Order. (Order, ECF 3.) Should Camara not be removed by April 6, 2026, Respondent will release him on his prior Order of Supervision that day.

**I. FACTUAL BACKGROUND**

This Court ordered Respondent to address the following items:

"(1) Camara's Mauritanian passport/travel documents which will be used to gain Camara's re-entry into that country; (2) if no such documentation is currently available, Respondent shall submit a declaration or report explaining whether the Mauritanian government has since waived the requirement that Camara produce a "Judgment of Parentage" issued by a Mauritanian judge before travel documents can be issued (see Pet'r Ex. D, Doc. 10-4, PageID 84); (3) Respondent shall submit a

declaration or report explaining what additional steps, if any, Respondent has taken to obtain issuance of Camara's passports/travel documents from the Mauritanian government since September 17, 2025, when Respondent last asked for those items and whether the Mauritanian government has ever responded to that request; (4) Respondent shall submit a declaration or report explaining when, if ever, Respondent expects to receive said passport/travel documents from the Mauritanian government; (5) if, as Respondent claims, "traditional travel document[s] [are] not being used," Respondent shall submit a declaration or report explaining in detail how it intends to gain Camara's lawful re-entry into Mauritania without a "traditional travel document" (see Respt Ex. A, Doc. 16-1, PageID 157); (6) finally, in the event the government of Mauritania refuses to accept Camara, Respondent shall submit a declaration or report explaining in detail what next steps it will follow regarding Camara's person or disposition stemming from his continued confinement by ICE, relative to this Court's Order (Doc. 14, PageID 152) that he be immediately released and the terms of his supervision restored, under the Due Process Clause and the Supreme Court's holding in *Zadvydas*, pending his reasonably foreseeable removal. *See Zadvydas v. Davis*, 533 U.S. 678, 699700 (2001)."

(March 22, 2026 Notation Order.)

## II. ARGUMENT

Petitioner's removal to Mauritania is scheduled in 6 days, therefore, his removal to Mauritania is immediately foreseeable. Respondent respectfully requests this Court lift the Do Not Remove Order. (Order, ECF 3.)

**A. PETITIONER IS SCHEDULED FOR REMOVAL TO MAURITANIA ON MARCH 29, 2026.**

The Petitioner is currently scheduled to be removed to Mauritania on March 29, 2026. (Call-in Letter, ECF 16-1; Declaration of Miguel Rodriguez, Ex. A, at 2, ¶5.) In fact, Mr. Rodriguez, a Detention and Deportation Officer with the Removal Management Division of ICE, declared that he received notification from the State Department's Bureau of African Affairs, "that they received a cable from the U.S. Embassy in Nouakchott, Mauritania." (*Id.* at 2, ¶4.) He further provided that the confidential cable, "indicated Mauritanian Government has agreed to accept the DHS Certificate of Identity for Departure from the United States (Form I-269) as a valid travel document for removing Mauritanian nationals from the United States." (*Id.*; Camara I-269, Ex. B.)

As a result, Petitioner's removal to Mauritania is significantly likely to occur in the reasonably foreseeable future, that is: March 29, 2026.

Respondent addresses items (1)-(6) below.

(1) The Petitioner will be using the I-269, (Camara I-269), to gain Camara's re-entry into Mauritania, which the Mauritanian Government agreed to "accept [] as a valid travel document for Mauritanian nationals being removed from the United States." (Rodriguez Decl., Ex. A, at 2, ¶4.)

(2) Because the Mauritanian Government will accept the I-269 as a valid travel document, to whether the Mauritanian Government will require a "Judgment of Parentage," seems unnecessary. As discussed below, if Mauritania will not accept Petitioner, then he will be returned to his previous Order of Supervision.

(3) As provided in the Declaration of Miguel Rodriguez, the State Department's agreement with Mauritania to accept I-269s as travel documents for removing Mauritanian nationals from the United States, demonstrate additional steps taken by Respondent to obtain travel documents from the Mauritanian Government.

(4) Respondent does not expect to receive a travel document from Mauritania because the Government of Mauritania has agreed to accept an I-269 as "a valid travel document for removing," Petitioner "from the United States" to Mauritania. (Rodriguez Decl., Ex. A, at 2, ¶4.)

(5) See Response to No. (1).

(6) If Mauritania refuses to accept Camara, or he is not be removed by April 6, 2026, Respondent will release him on his prior Order of Supervision. Importantly, Respondent suggests that this Court delay terminating this case until Camara has been removed or placed back on his previous Order of Supervision.

**B. PETITIONER HAS RECEIVED THE RELIEF REQUESTED.**

Petitioner requested this Court, inter alia, to prevent the transfer of Petitioner out of this district, declare that Respondent violated Petitioner's due process rights in detaining him, and ordered his immediate release. (Petition, ECF 1, PageID 15-16.) Petitioner has received all habeas relief requested. As a result, the Petition is moot. See, e.g., *Ikaro v. Attorney General*, No. 1:19-cv-175, 2020 WL 59662, \*3 (S.D. Ohio Jan. 1, 2020), report and recommendation adopted, 2020 WL 470272 (S.D. Ohio Jan. 29, 2020) ("petitioner's release from custody generally moots a habeas petition."); *Ventura-Pineda v. Secretary, DHS*, No. 1:18-cv-570, 2019 WL 3227980, \*2

(S.D. Ohio Jul. 17, 2011) (citing cases) *Willix v. Holder*, No. 1:11-cv-894, 2012 WL 463825 (W.D. Mich. Feb. 13, 2012) (finding habeas petition moot where petitioner seeking release pending removal is released pursuant to an order of supervision).

Further, this Court lacks jurisdiction to “stay deportation proceedings in the context of a habeas corpus petition.” *Yahya v. Attorney General*, Nos. 2:17-cv-1021 and 1073, 2018 WL 3145172, \*3 (S.D. Ohio Jun. 27, 2018), report and recommendation adopted, 2018 WL 3496412 (S.D. Ohio Jul. 20, 2018) (citations omitted) (citing 8 U.S.C. § 1252(a)(2)(C)). As a result, a district court cannot prevent the execution of a removal order.

However, the fact that the Petition is now moot, and this court lacks jurisdiction, is irrelevant. If Camara cannot be removed to Mauritania on the March 29, 2026 charter, Respondent will place him on his previous order of supervision.

### C. CONCLUSION

Respondent respectfully requests this Court lift its Do Not Remove Order for Petitioners March 29, 2026 removal to Mauritania.

Respectfully submitted,

DOMINICK S. GERACE II  
United States Attorney

*s/William B. King II*  
WILLIAM B. KING II (094046)  
Assistant United States Attorney  
221 East Fourth Street, Suite 400  
Cincinnati, Ohio 45202  
Office: (513) 684-3711  
Fax: (513) 684-6972  
E-mail: [Bill.King@usdoj.gov](mailto:Bill.King@usdoj.gov)

*Attorney for Respondent*