

**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.

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**RESPONDENT'S UPDATE TO THIS COURT'S MARCH 23, 2026  
NOTATION ORDER AND MOTION TO EXTEND TIME TO  
COMPLETE UPDATE**

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Respondent hereby submits the following update in response to this Court's March 22 and 23, 2026 Notation Orders and moves for an extension of time to complete its response until April 3, 2026.

Given the Court's Do-Not-Remove Order, Respondent recognizes that it will be impossible to remove Petitioner to Mauritania on March 29, 2026. Respondent respectfully requests additional time to respond to this Court's March 23, 2026 Notation Order to inform the Court regarding the outcome of the charter flight scheduled for March 29, 2026, and hope to provide additional helpful information.

**RESPONDENT'S UPDATE**

Respondent requested that this Court lift its Do Not Remove Order for Petitioner's removal to Mauritania. Respondent scheduled Petitioner's removal on a

charter flight leaving March 29, 2026 to Mauritania. (Notice, ECF 15; Call-in Letter, ECF 16-1; (Declaration of Miguel Rodriguez, Ex. A; I-269, Ex. B.) The Mauritanian Government agreed to accept I-269s as travel documents for removals from the United States to Mauritania. (Declaration of Miguel Rodriguez, Ex. A; I-269, Ex. B.)

In its March 22, 2026, Notation Order, this Court nonetheless concludes that, “by all measures,” Petitioner will not be able to enter Mauritania because the Call-in Letter requested the Petitioner to provide identification documentation issued by Mauritania and that Mauritania required a “Judgment of Parentage,” when Petitioner’s previous passport attempt was denied. The Court referenced the following cases in support, *Islam v. Kane*, No. 11-cv- 515, 2011 WL 4374226 (D. Ariz. Aug. 20, 2011) and *Shefqet v. Ashcroft*, No. 02-cv-7737, 2003 WL 1964290 (N.D. Ill. Apr. 28, 2003). (March 22, 2026 Notation Order.)

Both cited cases are readily distinguishable from this case. In those cases, post-removal-order detention was approximately 12 months and more than 17 months; the countries of removal were Bangladesh and Yugoslavia. In neither case had ICE offered evidence to the court that travel was scheduled on a flight to the receiving country and that the receiving country would accept the existing documentation.

Here, the Petitioner is not detained, Mauritania has agreed to accept I-269s as travel documents, and ICE is scheduling flights to Mauritania. That is significantly different than *Islam* and *Shefqet*. *Islam*, 2011 WL 4374226, \* 4 (stating that “DHS has not offered *any* specific evidence on the progress of its efforts to remove

Petitioner”); *Shefqet v. Ashcroft*, 2002 WL 196290, at \*5 (“Respondents have thirty days to remove Petitioner from the Country. If Respondents cannot remove Petitioner within thirty days, Petitioner’s writ of habeas corpus will issue . . . .”)

Respondent’s request to Petitioner to bring any Mauritanian identification documentation upon his report to ICE custody for removal does not mean that Petitioner must have a passport to be removed to Mauritania. Unlike the cases relied on by this Court, the evidence presented by Respondent is that Mauritania will permit Petitioner’s removal to that country using an I-269 identification document, and Mauritania will not require a passport or other traditional travel document.

Moreover, regarding a Judgment of Parentage, such record was required for a passport to be issued by Mauritania. But, given that a passport is unnecessary for Petitioner’s removal to Mauritania, a Judgment of Parentage is unnecessary to effect Petitioner’s removal into Mauritania.

In summary, Respondent asserts, in response to items (1)-(6) in this Court’s March 22, 2026 Notation Order, that:

(1) The Petitioner will be using the attached I-269, (Camara I-269, Ex. B), 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, a “Judgment of Parentage,” issued by the Mauritanian Government is unnecessary.

(3) Obtaining authorization from the Mauritanian Government to accept I-269 as travel documents for removing Mauritanian nationals from the United States, and scheduling a charter for removals to Mauritania on March 29, 2026, demonstrate the 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 Mauritania 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) Traditional travel documents, such as a passport, will not be used for Petitioner's re-entry into Mauritania. The Petitioner will be using the attached I-269, (Camara I-269, Ex. B), to gain Camara's re-entry to 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.)

(6) In the unlikely event that Mauritania refuses to accept Camara, he will be returned to the United States and placed on his prior Order of Supervision forthwith, or April 6, 2026, at the latest. Respondent is not opposed to this Court waiting until Petitioner is removed from the United States to Mauritania, or place on his previous Order of Supervision, to terminate the case.

This Response also provides additional details regarding Respondent's ability to remove Petitioner to Mauritania. This information was provided to this Court in

*Amadou Ly v. Raycraft*, No. 1:26-cv-00262-JPH-PBS, Reply, ECF (S.D. Ohio), on March 27, 2026.

On Monday, March 2, 2026, a cable signed by Corina R. Sanders, Chargé D’Affaires A.I. at the U.S. Embassy in Mauritania on March 2, 2026, was transmitted to the Department of State, Bureau of African Affairs in Washington, D.C. (See Sept. 19, 2025 Profile of Corina Sanders, Chargé D’Affaires A.I., <https://mr.usembassy.gov/charge-daffaires-a-i-corina-r-sanders/>) (last visited March 26, 2026). This cable was received on March 2, 2026, by Ciera Dehmand, Mauritania Desk Officer, Office of West African Affairs. The Bureau of African Affairs can be accessed here, <https://www.state.gov/bureaus-offices/under-secretary-for-political-affairs/bureau-of-african-affairs> (last visited, March 26, 2026). Ciera Dehmand transmitted the cable to the Declarant, ICE DDO Miguel Rodriguez on March 2, 2026.

These additional details of when the cable was sent and received and who sent and received it, further supports the veracity of the information provided by Miguel Rodriguez in his declaration, which he provided under penalty of perjury.

#### **A. MOTION FOR EXTENTION OF TIME**

The Respondent respectfully requests additional time to respond to this Court’s March 23, 2026 notation order. (March 23, 2026 Notation Order.) Respondent recognizes that it will be unable to remove Petitioner to Mauritania on March 29, 2026.

Respondent specifically requests additional time to respond to this Court's March 23, 2026 Notation Order to inform the Court of the outcome of the charter flight scheduled for March 29, 2026 to Mauritania..

**CONCLUSION**

Respondent respectfully requests an extension of time to complete its response to this Court's March 23, 2026 Notation Order until April 1, 2026.

Respectfully submitted,

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