

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

IBRAHIMA CAMARA,

Petitioner,

v.

KEVIN RAYCRAFT,
Field Office Director of Enforcement and
Removal Operations Detroit,
United States Immigration and Customs
Enforcement,
Department of Homeland Security,

Respondent.

Case No. 1:25-cv-00740

District Judge Jeffery P. Hopkins

Magistrate Judge Peter B. Silvain, Jr.

**RESPONDENT'S FINAL UPDATE AND MOTION TO
TERMINATE CASE**

Respondents provide this short update regarding the March 29, 2026 charter flight and respectfully request this Court terminate the case. (Oct. 20, 2025 Order, ECF 3.) Petitioner has received all relief requested. As a result, this case is moot.

MARCH 29, 2026 CHARTER FLIGHT UPDATE

Respondent has advised that six (6) individuals were successfully removed from the United States and repatriated to Mauritania aboard the scheduled March 29, 2026 charter flight, departing from Harlingen, Texas. Prior to the charter flight, on March 28, 2026, these six individuals, who each possessed a Form I-269, were provided *laissez passers* by the Mauritanian government. Any individuals scheduled

for the charter flight that were not issued *laissez passers* on March 28, 2026 were not removed to Mauritania.

BACKGROUND

On November 28, 2000, Petitioner was ordered removed from the United States to Mauritania. (Petition, ECF 1, PageID 4, ¶13.) Petitioner was detained by ICE for his removal to Mauritania on September 3, 2025. (*Id.* at PageID 2, ¶2.) On October 14, 2025, Petitioner filed his Petition for Writ of Habeas Corpus. (*Id.*)

On October 22, 2025, for purposes of “preserv[ing] its jurisdiction, and pursuant to its authority under the All Writs Act,” this Court ordered that “Respondents shall neither remove Ibrahima Camara from this District nor allow him to be removed from this District unless or until the Court orders otherwise.” (October 21, 2025 Order, ECF 3.) Respondent filed a Return of Writ on November 19, 2025 (Return of Writ, ECF 9), and Petitioner filed a reply on November 26, 2025. (Reply, ECF 10.) The Court requested additional briefing on December 4, 2025. (Order, ECF 11.) On December 18, 2025, Respondent filed a response to the Court’s December 4, 2025 Order. (Response, ECF 12.) The Petition remained pending until March 19, 2026. (Order Granting Petition, ECF 14.)

On March 20, 2026, this Court granted the Petition for a Writ of Habeas Corpus and ordered Petitioner’s release within one day. (Order Granting Petition, ECF 14.) Petitioner was immediately released. (Notice, ECF 15.)

On March 20, 2026, Respondent confirmed to this Court that Petitioner was released. Respondent also advised the Court that Petitioner was scheduled to be

removed to Mauritania on March 29, 2026, that he was instructed the Petitioner to report back to ICE on Monday, March 23, 2026, and requested this Court to lift its do not remove order. (Notice ECF 15; Call-in Letter, ECF 16-1.)

The Court requested additional information regarding Petitioner's scheduled removal to Mauritania. (March 22, 2026 Notation Order. (Response to Notation Order, ECF 18.)) Petitioner was taken back into ICD custody on March 23, 2026 for removal to Mauritanian on March 29, 2026.

A telephone conference was held on Petitioner's Emergency Motion to Enforce (Emergency Motion, ECF 17.) Respondent provided a Response to this Court's Notation Order prior to the telephone conference and emailed the Court an ICE Declaration regarding the charter flight to Mauritania and Petitioner's I-269 Identity Document. (Response to Notation Order, ECF 18.)

The declaration provided, under penalty of perjury, that Petitioner was scheduled for removal from the United States to Mauritania on a March 29, 2026 charter flight. (Declaration of Miguel Rodriguez, ECF 19-1.)

After argument, the Court again ordered Petitioner released from custody finding that Petitioner's removal to Mauritania was not reasonably likely. (March 23, 2026 Notation Order.) Petitioner was again released from custody.

The Court also instructed Respondent to "submit the documentation outlined in the Court's March 22, 2026, Notation Order, and provide specific information detailing whether the government of Mauritania will accept the DHS Certificate of Identity for Departure from the United States (Form I-269) as a valid travel

document as asserted in the Declaration of Miguel Rodriguez, which was provided to the Court. Decl. of Miguel Rodriguez.” (*Id.*)

Respondent submitted its Response on March 27, 2026, and informed the Court that Petitioner could no longer be removed on the March 29, 2026 charter flight. (Response to March 23, 2026 Notation Order, Doc. 19.) Respondent requested additional time (until April 3, 2026) to provide an update on the March 29, 2026 charter flight, and it was granted. (*Id.*; March 27, 2026 Notation Order.) Respondent has now updated the Court on the March 29, 2026 charter flight. Petitioner has been released and is no longer in ICE custody. Petitioner is not currently scheduled for removal to Mauritania. Respondent anticipates future charter flights to Mauritania. Therefore, Petitioner may be on a future flight manifest and be requested to report in the future for another removal flight.

ARGUMENT

I. The Petition is Now Moot, and the Case Should Be Terminated.

Article III of the Constitution limits the jurisdiction of the federal courts to the consideration of actual cases or controversies. *Spencer v. Kemna*, 523 U.S. 1, 7 (1998). Under this requirement, “throughout the litigation, the plaintiff must have suffered, or be threatened with, an actual injury traceable to the defendant and likely to be redressed by a favorable judicial decision.” *Spencer*, 523 U.S. at 7. “[A] case is moot when the issues presented are no longer ‘live’ or the parties lack a legally cognizable interest in the outcome.” *Powell v. McCormack*, 395 U.S. 486, 496 (1969); *see also Cooney v. Strickland*, 588 F.3d 924, 926 (6th Cir. 2009). “Mootness results when events

occur during the pendency of a litigation which render the court unable to grant the requested relief.” *Carras v. Williams*, 807 F.2d 1286, 1289 (6th Cir. 1986) (citations omitted). Where “no effective relief for the alleged violation can be given,” claims must be dismissed as moot. *Coal. For Gov’t Procurement v. Fed. Prison Indus., Inc.*, 365 F.3d 435, 458 (6th Cir. 2004).

A. All Available Relief Requested in the Petition Has Been Granted.

Respondent respectfully requests this Court terminate this case. (Order, ECF 3.) The Petitioner has received the relief requested in his Petition. Petitioner requested this Court, *inter alia*, prevent the transfer of Petitioner out of this district, declare that Respondent violated Petitioner’s due process rights in detaining him, and order his immediate release. (Petition, ECF 1, PageID 15-16.) Petitioner received all habeas relief requested. (Order Granting Habeas Relief, ECF 14.) 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) (A “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).

Petitioner remains subject to a valid order of removal. Respondent has no current flight scheduled to implement his removal, but such a flight may be scheduled in the future. Nonetheless, because this case is now moot, it should be terminated. Should Petitioner be re-detained pending removal on another charter flight to Mauritania in the future after this case is terminated, any request for relief based on such future detention may be pursued in a new petition for a writ of habeas corpus at that time.

**B. 8 U.S.C. § 1252(g) Bars This Court From Preventing
Petitioner's Removal.**

As this Court acknowledged, this Court has no jurisdiction to prevent Petitioner's removal. (Order, ECF 14, PageID 138-39 ("the district court's jurisdiction over [] detention-based claims is *independent* of its jurisdiction over the removal-based claims." *Hamama v. Adducci*, 912 F.3d 869, 877 (6th Cir. 2018) (emphasis added); *accord Mingrone v. Adducci*, No. 2:17-cv-11685, 2017 WL 4909591, at *8 (E.D. Mich. July 5, 2017) (noting that determinations of unlawful detention are separate from challenging removal; a detainee's challenge to detention "need not show that proceeding with his removal is improper (he could be released [from detention] and ICE could still proceed to remove him)").).

Section 1252(g) categorically bars jurisdiction over "*any* cause or claim by or on behalf of any alien *arising from* the decision or action by the [Secretary of Homeland Security] to commence proceedings, adjudicate cases, or *execute* removal orders against any alien." 8 U.S.C. § 1252(g) (emphasis added). The Secretary of

Homeland Security's decision to *execute removal orders*, including the decision to detain an alien pending such removal, squarely falls within this jurisdictional bar. See *Hamama v. Adducci*, 912 F.3d 869, 876 (6th Cir. 2018).

Petitioner does not, and cannot challenge, the legitimacy of his removal order in these proceedings. Petitioner's detention claims have been fully resolved, and this Court is without jurisdiction to review a future decision by Respondent to execute Petitioner's removal order.

CONCLUSION

Respondent respectfully requests that this case be terminated.

Respectfully submitted,

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