

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MAMADOU BOCUOM NDOYE,

Petitioner,

v.

WILLIAM JOYCE, *et al.*,

Respondents.

25 Civ. 8856 (VSB)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the government respectfully submits this Return, together with the accompanying Memorandum of Law in opposition to the Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner Mamadou Bocuom Ndoye (ECF No. 1), and the Declaration of Deportation Officer Declaration of Jonathan Quizhpi dated November 7, 2025 (ECF No. 14). The attached documents are taken from Ndoye’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement (“ICE”).

1. Exhibit A are copies dated October 17, 2008, Notice to Appear, which was served on Petitioner, and a Record of Deportable/Inadmissible Alien prepared by an Immigration Enforcement Agent.

2. Exhibit B is a copy of the November 8, 2008 Immigration Judge Order of Removal of petitioner.

3. Exhibit C is a copy of ICE’s November 12, 2008 letter formally requesting a travel document on behalf of petitioner to the Embassy of the Republic of Mali.

4. Exhibit D is a copy of a letter from the Embassy of the Republic of Mali dated November 13, 2008, advising of a delay in processing travel documents.

5. Exhibit E are copies of Release Notification to Petitioner from ICE dated May 9, 2009, and an ICE Order of Supervision, which was received and signed by the petitioner on May 21, 2009.

The facts contained in Exhibits A through E, the November 7, 2025, the Declaration of Deportation Officer Jonathan Quizhpi and the exhibits thereto, and the law set forth in the government's memorandum of law in opposition to the Petition, establish that Ndoye's detention is lawful.

WHEREFORE, the government respectfully requests that the Court enter judgment denying the Petition.

Dated: New York, New York
November 7, 2025

Respectfully submitted,

JAY CLAYTON
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Southern District of New York
Attorney for Respondents

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