

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

MAMADOU BOCUOM NDOYE,

Petitioner,

v.

WILLIAM JOYCE, *et al.*,

Respondents.

25 Civ. 8856 (VSB)

**SUPPLEMENTAL RETURN TO
HABEAS PETITION**

Under 28 U.S.C. § 2243, the government respectfully submits this Supplemental Return, together with the previously filed Memorandum of Law (ECF No. 16); the previously filed Return filed by Petitioner (ECF No. 15); the Declaration of Deportation Officer Declaration of Jonathan Quizhpi dated November 7, 2025 (ECF No. 14); and Declaration of Mincheol So dated November 25, 2025 (ECF No. 21) in opposition to the Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner Mamadou Bocuom Ndoye (ECF No. 1). 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 F is a copy of an ICE Order of Supervision dated December 18, 2009, that served on and received by Petitioner on the same day.
2. Exhibit G is a copy of ICE’s Notice of Revocation of Release dated October 21, 2025, that served on and received by Petitioner on the same day.
3. Exhibit H is a copy of ICE’s Record of Deportable/Inadmissible Alien form I-213, dated October 27, 2025, along with an accompanying I-831 form.
4. The facts contained in Exhibits A through H; the November 7, 2025 Declaration of Deportation Officer Jonathan Quizhpi, the November 26, 2025 Declaration of Deportation Officer

Mincheol So, 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 26, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for Respondents

By: s/ John E. Gura, Jr.
JOHN E. GURA, Jr.
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Telephone: (212) 637-2712
E-mail: John.Gura@usdoj.gov