

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

MAMADOU BOCUOM NDOYE,

Petitioner,

v.

WILLIAM JOYCE, *et al.*,

Respondents.

25 Civ. 8856 (VSB)

**SECOND SUPPLEMENTAL  
RETURN TO HABEAS PETITION**

Under 28 U.S.C. § 2243, the government respectfully submits this Second Supplemental Return, with the government’s Memorandum of Law in Response to the Amended Petition (ECF No. 30) together with the previously filed Memorandum of Law (ECF No. 16); the previously filed Return and Supplemental Return filed by Petitioner (ECF Nos. 15 and 22); the Declaration of Jonathan Quizhpi dated November 7, 2025 (ECF No. 14); Declaration of Mincheol So dated November 25, 2025 (ECF No. 21) and the Supplemental Declaration of Jonathan Quizhpi dated December 16, 2025 (ECF No. 31) in opposition to the Petition for Writ of Habeas Corpus (“Petition”) and Amended Petition for Writ of Habeas Corpus (“Amended Petition”), filed by petitioner Mamadou Bocuom Ndoye (ECF Nos. 1 and 27). 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 I is a copy of a U.S. Customs and Border Protection NCIC/NLETS Screening Service (NNSV) for Petitioner with some redactions of state and federal identification numbers for Petitioner

2. Exhibit J 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 K; 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 and in its memorandum of law in opposition to the Amended 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  
December 16, 2025

Respectfully submitted,

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United States Attorney for the  
Southern District of New York  
*Attorney for Respondents*

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