

UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

ABDOUL KARIMOU DIALLO,

Petitioner,

v.

DONALD J. TRUMP, *et al.*,

Respondents.

Civil Action No. 1:25-cv-2012

Judge Jerry Edwards, Jr.

Magistrate Judge Joseph H. L. Perez Montes

MOTION FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM

Petitioner Abdoul Karimou Diallo respectfully requests that this Court issue a writ of habeas corpus ad testificandum to U.S. Immigration and Customs Enforcement pursuant to 28 U.S.C. § 2243, requiring it to produce at the hearing in this case Petitioner Diallo, who is currently detained at the Winn Correctional Center in Winnfield, Louisiana. Petitioner's testimony is material and necessary at this hearing, which is scheduled to begin at 10:30 AM on Wednesday, March 4, 2026, on the Court's virtual platform (Zoom).

Under § 2243, "the person to whom [a] writ is directed shall be required to produce at the hearing the body of the person detained." *See also Johnson v. Eisentrager*, 339 U.S. 763 (1950) (producing the detainee before the court "is the crux of the statutory scheme established by Congress [and] . . . is inherent in the very term 'habeas corpus'"). While § 2243 offers an exception where the petition "present[s] only issues of law," that is not the case here. On February 4, 2026, this Court ordered Respondents to produce evidence "regarding the initial paroling of Petitioner, any notice given to Petitioner regarding why he was taken back into custody, any administrative decisions relating to Petitioner's request for bond, or any opportunities given to

review his re-detention,” as well as information related to his medical care and condition. ECF 43 at 4. This evidence relates to squarely factual issues, not issues of law.

Section 2243 also provides that “the person detained may, under oath, deny any of the facts set forth in the return or allege any other material facts.” Mr. Diallo has firsthand knowledge of what occurred at his re-detention and is best positioned to testify as to his medical condition and care. Therefore, his testimony will allow the Court to “summarily hear and determine the facts, and dispose of the matter as law and justice require.” 28 U.S.C. § 2243.¹

Petitioner respectfully requests that the Court order Respondents to produce Mr. Diallo at the upcoming March 4 hearing.

¹ On February 27, 2026, Petitioner sought Respondents’ position on issuing this request jointly. On March 2, 2026, Respondents stated they would not join a request to produce Mr. Diallo for the hearing.

Dated: March 2, 2026

Respectfully submitted,

/s/ Michael Ferrara

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**Admitted pro hac vice*

***Pro hac vice admission pending*

CERTIFICATE OF SERVICE

I certify that I filed this Motion with the Clerk of the Court via the CM/ECF system on March 2, 2026.

/s/ Michael Ferrara