

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 0:25-cv-04774 (PAM/LIB)

XUE LOR,

Petitioner,

v.

PAM BONDI, et al.,

Respondents.

**FEDERAL RESPONDENTS'  
RESPONSE TO PETITION FOR  
WRIT OF HABEAS CORPUS**

Petitioner Xue Lor filed this habeas petition to seek release from detention by the U.S. Immigration and Customs Enforcement (“ICE”) pending his removal from the country. Respondents Pamela Bondi, Kristi Noem, Michael Bottjen, and the U.S. Department of Homeland Security (collectively, the “Federal Respondents”) submit this response<sup>1</sup> and respectfully request that the Court deny Lor’s petition because he is not entitled to habeas relief. Lor’s removal to Laos is likely to occur in the foreseeable future, which disposes of his main claim in this case. To the extent Lor can also raise a habeas challenge to the procedures ICE used when revoking his release, none of those challenges have merit.

**BACKGROUND**

The Federal Respondents draw the following background from Lor’s Complaint and Petition for Writ of Habeas Corpus, Dkt. 1 (“Pet.”), as well as from the Declaration of Christopher A. Campbell (“Campbell Decl.”) and the accompanying exhibits.

---

<sup>1</sup> This response is not submitted on behalf of any state officials.

**I. Lor's Background and Removal Proceedings**

Lor is a citizen of Laos who was admitted to the United States in January 1980. Campbell Decl. ¶¶ 5-6. Eighteen years later, in May of 1998, he was convicted of the offense of Second Degree Sexual Assault of a Child, in violation of Wisconsin State Statute 948.02(2). *Id.* ¶ 7.

About seven years after that, on May 17, 2005, officers from U.S. Immigration and Customs Enforcement's office of Enforcement and Removal Operations (ERO) arrested Lor and served him with a Notice to Appear, Form I-862, charging him as removable from the United States under section 237(a)(2)(A)(iii) of the Immigration and Nationality Act, as amended (Act), 8 U.S.C. § 1227(a)(2)(A)(iii), as an alien convicted of a crime deemed an aggravated felony under section 101(a)(43)(A) of the Act, 8 U.S.C. § 1101(a)(43)(A). Campbell Decl. ¶ 8. Lor was detained in ICE custody for the duration of his removal proceedings. *Id.*

On September 6, 2005, an immigration judge in Chicago ordered Lor removed from the United States but granted him Deferral of Removal to Laos under the Convention Against Torture. Campbell Decl. ¶ 9. ICE detained Lor while removal to a third country was pursued. *Id.*

On February 13, 2006, ERO released Lor from custody under an Order of Supervision as a result of an inability to acquire a travel document for his removal at that time. Campbell Decl. ¶ 10. His immigration detention during 2005-06 thus lasted just under nine months altogether. Since then, Lor has reported as directed by his Order of Supervision. *Id.* ¶ 11.

## II. Lor's Current Detention

As the petition emphasizes, the United States historically had difficulty removing Laotian nationals from the country. Pet. ¶¶ 23-27. But that situation recently changed. Since the time of Lor's release on supervision, Laos has resumed issuing travel documents for removals and accepting individuals for repatriation. Campbell Decl. ¶ 14. Since March 2025, ICE's St. Paul office has been able to remove more than 20 individuals to Laos. *Id.*

Given these changed circumstances, ICE revoked Lor's order of supervision on December 16, 2025, and took him into custody. Campbell Decl. ¶ 12 and Ex. A. He is now being detained pending removal to Laos<sup>2</sup>, which should occur soon given that ICE regularly conducts removals to that country. Campbell Decl. ¶ 14. ICE anticipates that Lor will be able to travel to Laos in the reasonably foreseeable future. Campbell Decl. ¶ 13. The agency is generally working diligently to effectuate that result.

After his arrest, ICE officers conducted an informal interview with Lor to give him an opportunity to respond to the agency's reasons for revoking his release. Campbell Decl. ¶ 9, Ex. C. Lor chose not to say anything during the interview, and offered no documents showing that his removal was unlikely to occur in the foreseeable future. Campbell Decl. Ex. C. He provided a written statement addressing a variety of other issues. *Id.*

---

<sup>2</sup> Counsel for Lor contacted ICE on December 18, 2025, and communicated Lor's wish to be removed to Laos rather than a third country, notwithstanding the deferral of removal order from 2005. Campbell Decl. ¶ 13.

### **III. Procedural History**

Lor filed this action on December 24, 2025, seeking relief under 28 U.S.C. § 2241. Dkt. 1. He filed an amended petition the next day. Dkt. 1. The gist of Lor's petition is that ICE will not be able to remove him in the foreseeable future, so his ongoing detention violates the Due Process Clause. Pet. ¶¶ 23-27, 30-35. He also takes issue with some of the logistics that led to his detention—i.e., who made the decision to revoke his release, whether that person found the conditions necessary for revocation were present, and whether ICE followed its own regulations for revoking supervision. Pet. ¶¶ 36-46, 58-82.

### **ARGUMENT**

The Court should deny Lor's petition. His pursuit of habeas relief is based on the idea that ICE will not be able to remove him to Laos in the reasonably foreseeable future.<sup>3</sup> Yet the evidence accompanying this response demonstrates that ICE is working to coordinate Lor's removal and will likely be successful. As for procedural concerns about Lor's re-detention, they would not entitle him to habeas relief even if they had merit (which they do not).

#### **I. Jurisdiction, Burden of Proof, and Scope of Review**

Lor seeks relief under 28 U.S.C. § 2241, which gives district courts jurisdiction to hear habeas petitions brought by individuals in federal custody. As the petitioner, Lor bears the burden of proving that he is in custody in violation of the Constitution or the laws of

---

<sup>3</sup> While the petition also references concerns about the possibility of removing Lor to a third country, *see* Pet. ¶¶ 28-29 and Prayer for Relief ¶ d, this theory is not well-developed and, in any event, was likely cured by counsel's communication to ICE that Lor prefers to be removed to Laos, which communication has informed ICE's current efforts. Campbell Decl. ¶ 13.

the United States. Judicial review is narrow in immigration matters, including challenges to immigration detention. See *I.N.S. v. Aguirre-Aguirre*, 526 U.S. 415, 425 (1999); *Hampton v. Mow Sun Wong*, 426 U.S. 88, 101 n.21 (1976) (“[T]he power over aliens is of a political character and therefore subject only to narrow judicial review.”). The Supreme Court has “underscore[d] the limited scope of inquiry into immigration legislation” and “repeatedly emphasized that over no conceivable subject is the legislative power of Congress more complete than it is over the admission of aliens.” *Fiallo v. Bell*, 430 U.S. 787, 792 (1977) (citations and internal quotation marks omitted).

These limitations are important in habeas actions that challenge a noncitizen’s civil immigration detention. Federal courts employ a narrow standard of review and exercise “the greatest caution” in evaluating constitutional claims that implicate those decisions. *Mathews v. Diaz*, 426 U.S. 67, 81-82 (1976). The plenary power of Congress and the Executive Branch over immigration necessarily encompasses immigration detention, because the authority to detain is elemental to the authority to deport. See *Shaughnessy v. United States*, 345 U.S. 206, 210 (1953) (“Courts have long recognized the power to expel or exclude aliens as a fundamental sovereign attribute exercised by the Government’s political departments largely immune from judicial control.”); *Carlson v. Landon*, 342 U.S. 524, 538 (1952) (“Detention is necessarily a part of this deportation procedure.”); *Wong Wing v. United States*, 163 U.S. 228, 235 (1896) (“Proceedings to exclude or expel would be vain if those accused could not be held in custody pending the inquiry into their true character, and while arrangements were being made for their deportation.”).

Lor's challenge in this case is to his detention pending removal. He contends that ICE's decision to re-detain him violates the Due Process Clause because there is no significant likelihood of his removal in the foreseeable future. Pet. ¶¶ 21-27, 30-35. That is a *Zadvydas* claim, the framework for which the Federal Respondents will outline below. See *Zadvydas v. Davis*, 533 U.S. 678 (2001). Lor also invokes the Administrative Procedure Act, Pet. ¶¶ 39-43, 58-82, asserts an amorphous claim labeled "Ultra Vires Action," Pet. ¶¶ 83-85, and accuses ICE of violating the *Accardi* doctrine, Pet. ¶¶ 86-89. Those claims merely repeat Lor's procedural quibbles with how ICE made its re-detention decision. To the extent Lor truly wants APA-style or mandamus-style review of the agency's decision, he would have to bring a regular civil action (and pay the full filing fee rather than the \$5.00 "habeas" filing fee). That is because the Eighth Circuit limits habeas petitioners to challenging the fact or duration of their confinement. *Spencer v. Haynes*, 774 F.3d 467, 469-71 (8th Cir. 2014); *Kruger v. Erickson*, 77 F.3d 1071, 1073 (8th Cir. 1996).

It is also worth emphasizing that Lor cannot use this petition to challenge the validity of his underlying removal order or ICE's execution of that order. Jurisdiction over that type of challenge lies with an immigration court in the first instance, and then with the appropriate federal court of appeals. See 8 U.S.C. § 1252; *Tostado v. Carlson*, 481 F.3d 1012, 1014 (8th Cir. 2007).

## **II. Legal and Statutory Authority for Detention Pending Removal**

ICE has the authority to detain Lor pending his removal from the United States. For more than two centuries, immigration officials have had the authority to charge noncitizens

as removable from the country, arrest noncitizens subject to removal, and detain noncitizens during removal proceedings. *See Abel v. United States*, 362 U.S. 217, 233 (1960). Through the Immigration and Nationality Act (“INA”), Congress enacted a multi-layered statutory scheme for the civil detention of noncitizens pending a decision on removal, during the administrative and judicial review of removal orders, and in preparation for removal. *See* 8 U.S.C. §§ 1225, 1226, and 1231. Once a noncitizen is subject to a final removal order—as Lor is here—his detention is governed by 8 U.S.C. § 1231 and its implementing regulations at 8 C.F.R. part 241.

A noncitizen who has been ordered removed lacks a legal right to remain in the United States, and his liberty interest in remaining in the country is reduced. Accordingly, federal law provides that “when an alien is ordered removed, the Attorney General shall remove the alien from the United States within a period of 90 days” and “shall detain the alien” during the removal period. 8 U.S.C. § 1231(a)(1)(A) and (a)(2)(A).<sup>4</sup> The “removal period” is the period during which the Department of Homeland Security begins to take steps to execute the noncitizen’s final removal order. *See id.* § 1231(a)(1)(A)-(B). That period begins on the latest of: (1) the “date the order of removal becomes administratively final”; (2) “[i]f the removal order is judicially reviewed and if a court orders a stay of the removal of the alien, the date of the court’s final order”; or (3) “[i]f the

---

<sup>4</sup> The Homeland Security Act of 2002 transferred many immigration enforcement and administrative functions from the Attorney General to the Secretary of Homeland Security. *See* Pub. L. No. 107-296, 116 Stat. 2135 (2002).

alien is detained or confined (except under an immigration process), the date the alien is released from detention or confinement.” *Id.* § 1231(a)(1)(B)(i)-(iii).

Detention during the 90-day removal period can be extended in some circumstances. For example, noncitizens who are removable after being convicted of an aggravated felony may be detained beyond 90 days. *Id.* § 1231(a)(6); *see also id.* § 1231(a)(1)(C) (suspension of removal period when noncitizen fails to make timely application for travel documents or acts to prevent removal). The Department of Homeland Security also conducts periodic post-order custody reviews to determine whether an alien subject to a final removal order should continue to be detained beyond the removal period. *See* 8 C.F.R. § 241.4 (addressing continued detention for inadmissible, criminal, and other aliens).

After the removal period expires, an alien may be released under an order of supervision. *See* 8 C.F.R. § 241.13. Specifically, an alien held beyond the removal period can seek release from custody by showing that “there is no significant likelihood of removal to the country to which he or she was ordered removed, or to a third country, in the reasonably foreseeable future.” *Id.* § 241.13(a). However, the Department of Homeland Security can revoke release “if, on account of changed circumstances, the Service determines that there is a significant likelihood that the alien may be removed in the reasonably foreseeable future.” *Id.* § 241.13(i)(2). The procedures for revocation are set out in a federal regulation, which requires that the alien:

be notified of the reasons for revocation of his or her release. The Service will conduct an initial informal interview promptly after his or her return to Service custody to afford the alien an opportunity to respond to the reasons for revocation stated in the notification. The alien may submit any evidence or information that he or she believes shows there is no significant likelihood

he or she be removed in the reasonably foreseeable future . . . . The revocation custody review will include an evaluation of any contested facts relevant to the revocation and a determination whether the facts as determined warrant revocation and further denial of release.

*Id.* § 241.13(i)(3). After a noncitizen is re-detained using these procedures, § 241.4 governs his continued detention pending removal. *Id.* § 241.13(i)(2).

### **III. Lor's Challenge to his Detention**

Lor's habeas petition challenges his continued detention on substantive grounds (Counts 1-2) and on procedural grounds (Counts 3-7). Pet. ¶¶ 47-89.<sup>5</sup> Both classes of claims fail. As explained below, Lor's detention comports with Due Process because there is a substantial likelihood that he will be removed to Laos in the reasonably foreseeable future. That is all the Supreme Court requires. *See Zadvydas*, 533 U.S. at 689 (“[P]ost-removal-period detention [is limited] to a period reasonably necessary to bring about that alien's removal from the United States.”). Furthermore, ICE properly revoked Lor's release and documented its re-detention decision in accordance with the applicable statutory and regulatory requirements. The Court should therefore deny this habeas petition in its entirety.

#### **A. Lor's *Zadvydas* Challenge**

The main thrust of Lor's habeas petition is that his continued detention violates 8 U.S.C. § 1231, as the Supreme Court has construed the statute under the Due Process Clause. This is better known as a *Zadvydas* challenge.

---

<sup>5</sup> As noted above, Lor's other claims should be analyzed as part of his overall procedural challenge to ICE's re-detention decision. The Federal Respondents will address them this way rather than as individual counts.

Although the plain language of § 1231(a)(6) does not impose any limit on how long a noncitizen can be detained pending removal, the Supreme Court in *Zadvydas* “read an implicit limitation into” the statute. 533 U.S. at 689. Thus, a person subject to a final order of removal cannot be detained indefinitely. *Id.* at 699-700. *Zadvydas* established a temporal marker: detention for six months or less is presumptively constitutional. *Id.* at 701. But continued detention does not automatically become unconstitutional after six months; longer detention still comports with due process if there is a “significant likelihood of removal in the reasonably foreseeable future.” *Id.* As the Supreme Court explained:

[a]fter this 6-month period, once the alien provides good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing. And for detention to remain reasonable, as the period of prior post-removal confinement grows, what counts as the “reasonably foreseeable future” conversely would have to shrink. *This 6-month presumption, of course, does not mean that every alien not removed must be released after six months. To the contrary, an alien may be held in confinement until it has been determined that there is no significant likelihood of removal in the reasonably foreseeable future.*

*Id.* (emphasis added). The end result is that a habeas petitioner must meet the initial burden of demonstrating no significant likelihood of his removal in the reasonably foreseeable future. *Id.* If he makes this showing, then the government must rebut it. *Id.*

### **1. No Due Process Violation**

Lor’s *Zadvydas* challenge fails on the merits because there is no due process violation in this case. Lor cannot make the initial showing required at step one of the *Zadvydas* analysis. And the Federal Respondents have presented evidence confirming that Lor’s removal is likely to occur in the reasonably foreseeable future.

At step one, Lor fails to satisfy the threshold requirement that he “provide[] good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future.” *Zadvydas*, 533 U.S. at 701. The petition is noticeably thin on this point, relying principally on the fact that Laos did not issue travel documents or accept individuals for repatriation in the decades after an immigration judge ordered Lor removed. Pet. ¶ 23-27. But the situation with Laos has since changed. The country is once again accepting individuals for repatriation, and the local ICE office has a documented trend of successful removals to Laos in the last six months. Campbell Decl. ¶ 14.

Lor notes that ICE had no travel document in-hand before re-detaining him. Pet. ¶ 21. The implication seems to be that until ICE has a travel document, Lor automatically demonstrates there is no significant likelihood of removal in the reasonably foreseeable future. Setting aside that Lor cites no authority for extending *Zadvydas* to create such a rule, his argument is one this Court has long rejected. “The mere passage of time, including concomitant delays in obtaining travel documents, is not alone sufficient to show that no such likelihood exists unless the delays are so extraordinarily long as to trigger an inference that travel documents will likely never issue at all.” *Joseph K. v. Berg*, 2019 WL 13254377, at \*3 (D. Minn. Mar. 15, 2019) (citations and internal quotation marks omitted), *adopted by* 2019 WL 13254378 (D. Minn. May 3, 2019). Because Lor cannot make the threshold showing under *Zadvydas*, the Court should deny his habeas petition.

Lor would fare no better at the second step of the *Zadvydas* analysis, even were the Court to reach it. The record evidence rebuts any notion that there is no significant likelihood of his removal to Laos in the reasonably foreseeable future. *See Zadvydas*, 533

U.S. at 701. In general, courts have found no significant likelihood of removal under *Zadvydas* in five circumstances:

1. where the detainee is stateless, and no country will accept him;
2. where the detainee's country of origin refuses to issue a travel document;
3. where there is no repatriation agreement between the detainee's native country and the United States;
4. where political conditions in the country of origin render removal virtually impossible; and
5. where a foreign country's delay in issuing travel documents is so extraordinarily long that the delay itself warrants an inference that the documents will likely never issue.

*Joseph K.*, 2019 WL 13254377, at \*3 (citations omitted). Lor's petition fails to plausibly allege<sup>6</sup> that any of these circumstances are present today, beyond offering one allegation about an estimated 5,000 individuals who are to be removed to Laos. Pet. ¶ 27.

Again, the problem for Lor is that there has been a significant change in the circumstances that historically prevented ICE from removing him to Laos. The petition does not acknowledge this change, let alone explain how ICE will continue to have difficulty removing Lor now that Laos is accepting individuals for repatriation. When the record shows "diligent and reasonable efforts to obtain travel documents," and "the alien's native country ordinarily accepts repatriation, and that country is acting on an application for travel documents, most courts conclude that there is a significant likelihood of removal in the foreseeable future." *Ahmed v. Brott*, 2015 WL 1542131, at \*4 (D. Minn. Mar. 17, 2015) (cleaned up). To the extent ICE encounters delays in obtaining a travel document,

---

<sup>6</sup> Lor's assertion that he is "stateless" lacks any sort of foundation.

such delays would not be “sufficient to trigger an inference that there is no significant likelihood of removal; they simply show that the bureaucratic gears are slowly grinding away.” *Id.* (cleaned up).

Lor’s current detention serves a clear purpose by “assuring [his] presence at the moment of removal.” *Zadvydas*, 533 U.S. at 699. The Supreme Court long ago recognized that detention to facilitate removal is a legitimate governmental objective. *See Wong Wing*, 163 U.S. at 235 (“Proceedings to exclude or expel would be vain if those accused could not be held in custody pending the inquiry into their true character and while arrangements were being made for their deportation.”). Likewise, Lor’s detention has a definitive endpoint: his removal to Laos. He has currently been detained for less than a month while ICE works to facilitate that removal, and “[t]he mere passage of time, including concomitant delays in obtaining travel documents, is not alone sufficient to show that no such likelihood exists unless the delays are so extraordinarily long as to trigger an inference that travel documents will likely never issue at all.” *Joseph K.*, 2019 WL 13254377, at \*2 (cleaned up). For these reasons, the Federal Respondents have rebutted any presumption Lor raised (or tried to raise) regarding the likelihood of his removal in the reasonably foreseeable future.

This case is very similar to the habeas petition filed in *Vue v. Mchenry et. al.*, which this Court dismissed this past summer. No. 25-2827 (PAM/DLM) (D. Minn. filed July 11, 2025). Like Lor, the petitioner in *Vue* was a citizen of Laos who was ordered removed from the United States more than twenty years ago. *Id.* ECF No. 7, at 2 (memorandum and order filed July 21, 2025). And like Lor, the petitioner was arrested and re-detained in

2025, when ICE revoked his Order of Supervision and started the process of obtaining travel documents from Laos. *Id.* Mr. Vue filed a habeas petition to challenge his detention, invoking *Zadvydas*. *Id.* at 4. This Court denied that petition on July 21, 2025, concluding that: (1) the petitioner had received a Notice of Revocation that explained the basis for the revocation of his supervision; and (2) ICE was working toward his removal to Laos, which was reasonably likely to occur in the foreseeable future. *Id.* at 4-5. *Vue* is on-point and supports denying Lor's petition.

Because the constitutional due process standards set forth in *Zadvydas* are satisfied in this case, Lor is not entitled to habeas relief.

#### **B. Lor's Procedural Challenge**

Lor also asserts procedural challenges to his re-detention. For example, he questions whether the person who signed the Notice of Revocation of Release had the authority to do so, and he asserts that ICE never gave him adequate notice of the reasons for revoking his release. These allegations are immediately out of place in a habeas action because Lor does not tie them to the appropriate *habeas* remedy: release from custody. If the Court were to conclude that ICE's re-detention procedures were deficient, then the solution would be for the agency to redo the process and correct any deficiencies—not release Lor from detention outright. Because none of the procedural issues listed in the petition would require Lor's release from custody, the Court should not grant him habeas relief as to any of those challenges.

Setting aside the mismatch between procedural claims and habeas remedies, Lor's challenges lack merit for several reasons. First, he overlooks that nothing in § 1231 “shall

be construed to create any substantive or procedural right or benefit that is legally enforceable by any party against the United States or its agencies or officers.” 8 U.S.C. § 1231(h). Lor is trying to obtain habeas relief by asserting rights to procedural steps that he simply does not enjoy.

Second, Lor reads requirements into ICE’s regulations that do not exist. He goes on about “findings” that ICE officials must make when deciding to re-detain a noncitizen, *see, e.g.*, Pet. ¶¶ 20, 37, 63-65, 88, without citing any statute or regulation that requires those findings to be put in writing and delivered to the noncitizen. The regulation is straightforward; under 8 C.F.R. § 241.13(i)(2), ICE is authorized to revoke a noncitizen’s release and return him to custody “if, on account of changed circumstances, the [agency] determines that there is a significant likelihood that the alien may be removed in the reasonably foreseeable future.”<sup>7</sup> That is what happened. ICE personnel determined that they would be able to remove Lor from the United States because Laos is accepting individuals for repatriation. Campbell Decl. ¶ 14. As the notice explained:

On May 17, 2005, you were issued a Notice to Appear, Form I-862. On September 6, 2005, an Immigration Judge in Chicago, IL, ordered you removed from the United States to Laos. On February, 13, 2006, ICE officials released you from custody on an Order of Supervision, Form I-220B. Since being released, removal from the U.S. is now significantly likely in the reasonably foreseeable future. Based on changed circumstances in your case you will be brought back into ICE custody.

Campbell Decl. Ex. A. There is no regulatory requirement to provide any further explanation to Lor or to list out the other findings that led to his re-detention.

---

<sup>7</sup> Lor’s petition invokes provisions in 8 C.F.R. § 241.4 in this regard. Pet. ¶¶ 36-38. But that section does not govern the substance of the re-detention decision at issue here, which arises under § 241.13(i).

Third, Lor's Notice of Revocation of Release was signed by an Acting Deputy Field Office Director. Campbell Decl. Ex. A. That person had the delegated authority to sign the notice and make re-detention decisions. *See, e.g.*, 8 C.F.R. § 241.1(c)(1), (4) ("Delegation of authority" and "Additional delegation" sections referencing Field Office Directors and those to whom they, in turn, routinely delegate authority); *id.* § 241.13(i)(2) ("*The Service* may revoke . . .") (emphasis added).

\* \* \*

Lor's procedural challenges would not entitle him to relief even if they had merit. But as discussed above, the record evidence of ICE's re-detention decision shows that the agency complied with the applicable regulatory requirements. The Court should therefore deny Lor's habeas petition to the extent it raises procedural due process (and related) challenges to his ongoing detention.

**CONCLUSION**

The Federal Respondents respectfully request that the Court deny Lor's habeas petition in its entirety. No evidentiary hearing is necessary in this matter because the submissions filed with this response provide a sufficient record upon which the Court can adjudicate the petition.

Dated: January 5, 2026

DANIEL N. ROSEN  
United States Attorney

*s/ David W. Fuller*

BY: DAVID W. FULLER  
Assistant United States Attorney  
Attorney ID Number 0390922  
600 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
(612) 664-5600  
David.fuller@usdoj.gov