

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

Phong Vang,
Petitioner,

v.

Mary De Anda Ybarra, et al.,
Respondents.

Civil Action No. EP-26-CV-117-KC

RESPONSE TO SHOW CAUSE

Federal Respondents submit this response to this Court's Show Cause Order. Please see Exhibit A, which is a declaration with all of the facts presented below.

On February 2, 2026, ERO El Paso submitted a TD Request to ICE HQ RIO for Bangladesh. Ex. A, Dec. ¶ 4. ICE has identified Bangladesh as a possible third country for removal. *Id.* ¶ 5. ERO has submitted a TD request for Vang for Bangladesh, and the DDO is still reviewing the TD request. *Id.* ¶ 6. ERO El Paso submitted a TD request for Vang to ICE HQ RIO for Bangladesh on February 2, 2026. The DDO is still reviewing the TD request for possible submission to Bangladesh. Currently, there is not anticipated timeline for approval. *Id.* ¶ 7.

Dated: March 6, 2026

Respectfully submitted,

JUSTIN R. SIMMONS
UNITED STATES ATTORNEY

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