

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LA BA,

PETITIONER,

V.

NO. EP-26-CV-421-KC

MARY DE ANDA YBARRA, ET. AL.,

RESPONDENTS.

RESPONSE TO SHOW CAUSE ORDER

Now comes Federal Respondents and file this Response to the Court's Order, ECF Doc. 5, dated February 24, 2026. Federal Respondents further rely on all facts stated in the attached declaration, Exhibit A. A request for travel documents can be submitted for review, however with no signature it is unlikely to meet the criteria for issuance of a travel document by the Royal Thai Embassy. Ex. A ¶ 4. However, Petitioner has now agreed to cooperate in completing the travel documents application. *Id.* ¶ 4. TDR is expected to be submitted to ERO HQ by March 25, 2026, and once approved it will be submitted to the Royal Thai Embassy. *Id.* ¶ 6. No third countries for removal have been identified. *Id.* ¶ 8. As such Federal Respondents request that Petitioner's Writ of Habeas Corpus be denied.

Respectfully submitted,

JUSTIN R. SIMMONS
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