# UNITED STATES DISTRICT COURT
# MIDDLE DISTRICT OF FLORIDA
# FORT MYERS DIVISION

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| **CONROY CONDECORE**<br>Petitioner,<br>v.<br><br>**TODD BLANCHE**, U.S. Attorney General, in his official capacity<br><br>**KELEI B. WALKER**, Orlando Field Office Director, **U.S IMMIGRATION AND CUSTOMS ENFORCEMENT**<br><br>**MARKWAYNE MULLIN**, Secretary, **DEPARTMENT OF HOMELAND SECURITY,**<br><br>**TODD LYONS,** Acting Director, **U.S IMMIGRATION AND CUSTOMS ENFORCEMENT**<br><br>**KEVIN GUTHRIE,** Executive Director, **SOUTH FLORIDA DETENTION CENTER / FLORIDA DIVISION OF EMERGENCY MANAGEMENT**<br><br>In their official capacities, Respondents.<br>/ | Civil No. Agency No.:<br><br>2:26-cv-1704-SPC-NPM<br><br>A[redacted]<br><br>**NOTICE OF COMPLIANCE** |

**PETITIONER'S NOTICE OF COMPLIANCE WITH LOCAL RULE 3.01(g) AND NOTICE OF RESPONDENTS' OPPOSITION TO RELIEF SOUGHT**

Petitioner Conroy Condecore, through undersigned counsel, files this Notice pursuant to Local Rule 3.01(g) to advise the Court of the conferral that took place between counsel prior to and following the filing of Petitioner's Emergency Motions (ECF Nos. 17, 18), and to supplement

the record with material disclosures made by counsel for the Federal Respondents in the course of that conferral.

1. **Conferral by Petitioner's Counsel.** On July 2, 2026, at approximately 6:40 p.m., undersigned counsel sent an email to counsel for the Federal Respondents, Assistant United States Attorneys Amanda Saylor, Alikai Foskey, and Barbara Beechner, pursuant to Local Rule 3.01(g), requesting conferral regarding the Emergency Motion to Reopen, for Order to Show Cause, for Temporary Restraining Order, and for Immediate Disclosure (ECF No. 17). Petitioner's counsel specifically requested that the government: (1) voluntarily stay Mr. Condecore's removal pending resolution of the emergency motion; (2) immediately disclose Mr. Condecore's current location and provide telephone access to consult with him; and (3) disclose the date, time, destination, and basis for any scheduled removal, and confirm whether travel documents and third-country government acceptance had been obtained. A true and correct copy of Petitioner's conferral email is attached hereto as Exhibit 1.

2. **Response from Federal Respondents' Counsel.** AUSA Saylor responded by email on July 5, 2026. A true and correct copy of that response is attached hereto as Exhibit 2. The government opposes the relief sought in Petitioner's Emergency Motions. Ms. Saylor's response disclosed the following information that is material to the Court's consideration of the pending motions and that has not otherwise been made part of the record:

   (a) *Current Detention Location*: As of the morning of July 5, 2026, Petitioner is located at the Jackson Parish Correctional Center in Louisiana, a staging facility, consistent with the detention history filed by the government as ECF No. 19-1, which reflects Petitioner's current book-in at Jackson Parish Correctional Center as of July 4, 2026.

(b) *Purpose of Re-Detention*: Counsel for the Federal Respondents confirmed that Petitioner "was redetained for the purpose of seeking his removal to Eswatini." This is the first official confirmation from the government in this proceeding that Eswatini is the intended country of removal.

(c) *Absence of OSUP Revocation Documentation*: AUSA Saylor disclosed that as of July 5, 2026, she has "not yet seen the documents pertaining to OSUP revocation" or the plans for Petitioner's removal to Eswatini, and that she is awaiting production of that documentation from ICE. The government has thus filed a substantive opposition to Petitioner's Emergency Motions without having reviewed the underlying documentation for the very re-detention it is defending.

(d) *No Voluntary Stay*: The government declined to voluntarily stay Petitioner's removal pending resolution of the emergency motion.

(e) *No Disclosure of Travel Documents or Third-Country Acceptance*: Counsel for the Federal Respondents did not confirm whether travel documents have been obtained or whether the government of Eswatini has specifically agreed to accept Petitioner. This information was specifically requested in Petitioner's conferral email and has not been provided.

S/ Sasha Watson

SASHA WATSON (State Bar No. 42845)
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Attorney for Petitioner

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 5, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will furnish copies to all registered counsel of record.

/s/ Sasha Watson

Attorney for Petitioner

**Sasha Watson-** [redacted]

**From:** Saylor, Amanda (USAFLM) <Amanda.Saylor@usdoj.gov>
**Sent:** Sunday, July 5, 2026 3:01 PM
**To:** Sasha Watson- 9723; Foskey, Alikai (USAFLM); Beechner, Barbara (USAFLM)
**Cc:** Rose D'Haiti- 7735
**Subject:** RE: URGENT - Local Rule 3.01(g) Conferral - Condecore v. Blanche, et al., 2:26-cv-1704-SPC-NPM - Emergency Motion to Reopen and TRO

**Categories:** Smokeball

External (amanda.saylor@usdoj.gov)

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Good afternoon, Ms. Watson.

A few moments ago I filed an opposition to Petitioner's motions at ECF Nos. 17, 18. While I have been in touch with ICE periodically throughout the weekend on this matter, I don't have much that I am able to share with you beyond what is already known to you. My understanding is that your client was redetained for the purpose of seeking his removal to Eswatini. As of this morning he is located at the Jackson Parish Correctional Center in Louisiana. As I've representing in the filing I just made, I have not yet seen the documents pertaining to OSUP revocation or those plans for removal but will file supplemental materials when they are made available to me. Still, I believe ICE is sufficiently positioned to argue against a TRO/reopening on jurisdictional grounds and res judicata, as argued.

ICE is aware that a TRO motion is pending and I have asked that they reach out to me before Mr. Condecore departs on an outgoing flight so I can confirm at that time whether a TRO order has issued or not (and if so, obviously advise not to proceed with removal). If I am provided with additional information that I'm permitted to share with you I'll do so.

Best regards,
Amanda Saylor

**From:** Sasha Watson- [redacted] <swatson@hawmlaw.com>
**Sent:** Thursday, July 2, 2026 6:40 PM
**To:** Saylor, Amanda (USAFLM) <Amanda.Saylor@usdoj.gov>; Foskey, Alikai (USAFLM) <Alikai.Foskey@usdoj.gov>; Beechner, Barbara (USAFLM) <Barbara.Beechner@usdoj.gov>; CaseView.ECF (EOUSA) <CaseView.ECF@usa.doj.gov>; USAFLM-TPADKT <USAFLM.TPADKT@usa.doj.gov>
**Cc:** Rose D'Haiti- 7735 <r.dhaiti@hawmlaw.com>
**Subject:** [EXTERNAL] URGENT - Local Rule 3.01(g) Conferral - Condecore v. Blanche, et al., 2:26-cv-1704-SPC-NPM - Emergency Motion to Reopen and TRO

Good Evening Ms. Saylor:

I am writing pursuant to Local Rule 3.01(g) to confer regarding Petitioner's Emergency Motion to Reopen, for Order to Show Cause, for Temporary Restraining Order Enjoining Removal, and for Immediate Disclosure of Removal Details, filed today in the above-captioned matter.

As you are aware, this Court granted Mr. Condecore's Petition for Writ of Habeas Corpus on May 29, 2026, finding no significant likelihood of removal in the reasonably foreseeable future and ordering his release within 24 hours. He was released on May 30, 2026. On July 2, 2026, ICE re-detained Mr. Condecore. I have been informed that his removal from the United States has been scheduled and is expected to occur imminently. Accordingly, we filed the motion immediately but are hoping to resolve this matter without unnecessary litigation.

It is our understanding, no material change in circumstances has occurred since this Court's May 29 Order. I am writing to request that the government:

(1) Voluntarily stay Mr. Condecore's removal pending resolution of the emergency motion;
(2) Immediately provide me with Mr. Condecore's current location and telephone access to consult with him; and
(3) Disclose the date, time, destination, and basis for any scheduled removal, and confirm whether travel documents and third country government acceptance have been obtained.

If the government is prepared to voluntarily stay removal pending the Court's ruling on the emergency motion, I am willing to discuss a briefing schedule that provides the government a reasonable opportunity to respond and present any new evidence of changed circumstances.

Given the imminent nature of the scheduled removal, I need to hear from you as soon as possible. I am available by telephone at (407) 802-3223 or (786)210-6969.

Regards,

HAWM
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DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us immediately at (407) 802-3223 and ask to speak to the sender of the communication.
In addition, please e-mail and notify the sender immediately that you have received the communication in error.

Thank you. HAWM Law, PLLC - Attorneys at Law