UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Ijeoma M.C.,

Petitioner,

v.

Todd Blanche, et al.,

Respondents.

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MINNEAPOLIS, MINNESOTA

Case No. 26-cv-03168 (JWB/DJF)

PETITIONER'S OBJECTIONS TO REPORT AND RECOMMENDATION

Petitioner Ijeoma M.C., proceeding pro se, respectfully objects to the August 12, 2026 Report and Recommendation ("R&R") recommending denial of her Petition for a Writ of Habeas Corpus.

Petitioner asks the District Court to review the following specific findings de novo.

OBJECTION ONE

The Present Record Does Not Establish a Significant Likelihood of Removal in the Reasonably Foreseeable Future

The R&R concludes that Petitioner's removal is significantly likely in the reasonably foreseeable future because ICE previously obtained a Nigerian travel document and has requested another one.

Petitioner objects to that conclusion.

The previous Nigerian travel document expired on July 14, 2026. Although ICE states that it requested another travel document, there is presently no replacement document known to Petitioner.

Since the previous document expired:

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- no replacement travel document has been issued to Petitioner's knowledge;
- Petitioner has not been informed that Nigeria approved the request;
- no expected issuance date has been provided;
- no new removal date has been given; and
- no new removal flight has been scheduled or communicated to Petitioner.

The Government's request for another travel document shows that ICE is attempting to obtain one. It does not establish that Nigeria has agreed to issue one or when it will do so.

Under *Zadvydas v. Davis*, 533 U.S. 678 (2001), the relevant question is whether removal is significantly likely in the reasonably foreseeable future. Petitioner has remained continuously detained since December 4, 2025.

The fact that ICE successfully obtained a travel document in the past does not, by itself, establish present removability after that document expired.

Respondents' August 13, 2026 status report confirms that Petitioner remains detained at Sherburne County Jail. It provides no information establishing that a replacement Nigerian travel document has been issued or that another removal has been scheduled.

Petitioner therefore respectfully objects to the finding that the existing record sufficiently establishes a significant likelihood of removal in the reasonably foreseeable future.

OBJECTION TWO

Petitioner's Current and Documented Medical Needs Require Immediate Consideration in Determining the Reasonableness of Continued Detention and Appropriate Relief

Petitioner objects to the R&R's treatment of her medical circumstances and respectfully submits that her present medical needs require immediate consideration in determining whether continued detention is appropriate.

Petitioner's medical condition is not speculative. ICE has acknowledged that Petitioner has a medical condition requiring continuous monitoring, and Respondents' August 13, 2026, status report confirms that Petitioner has required admissions to and discharges from local healthcare facilities while remaining detained at Sherburne County Jail.

Petitioner also previously submitted medical evidence concerning her need for gynecological surgery, including the surgery order attached as an exhibit to her prior filing. The need for surgery therefore forms part of the medical circumstances previously presented to the Court and is not merely a generalized concern about detention.

Petitioner's medical condition has continued to require attention. On August 3, 2026, Petitioner suffered another serious medical episode in which she was found unconscious and required hospital care. Following that episode, Petitioner received a referral for cardiology evaluation and follow-up.

These circumstances demonstrate an immediate and continuing need for medical care. Petitioner now faces the need for gynecological surgery while also requiring cardiology assessment following the August 3 episode.

Petitioner respectfully submits that the Court should consider the practical consequences of continuing detention while these medical needs remain active. Surgery requires more than the procedure itself. It also requires appropriate preoperative assessment, postoperative monitoring, follow-up, continuity of care, and appropriate response to complications. Those concerns are particularly significant where Petitioner has already experienced an episode involving loss of

consciousness and has been referred for cardiac evaluation. Petitioner's condition continues to worsen with prolonged detention.

At the same time, there is no current removal date. The previous Nigerian travel document has expired, no replacement document is presently known to Petitioner, and no new removal flight has been scheduled.

The Government states that it is seeking another travel document. Petitioner respectfully submits that an uncertain future removal process should not result in continued detention without meaningful consideration of her present and documented medical needs.

Petitioner is not asking the Court to disregard the removal proceedings. Rather, she asks the Court to recognize that her medical circumstances now require immediate attention and should be given substantial weight in determining the reasonableness of continued detention and the appropriate habeas relief.

Continued detention while ICE waits for another travel document risks complicating Petitioner's treatment and continuity of care at a time when she requires surgery, continuous medical monitoring, and cardiology evaluation.

Even if there is a removal proceeding, Petitioner's medical condition at this time requires urgent attention, which prioritizes and supersedes the removal proceeding.

Petitioner therefore respectfully requests that the Court consider release under reasonable conditions so that she can obtain the ordered surgery, cardiology evaluation, appropriate follow-up, and continuity of care.

REQUEST FOR RELIEF

For these reasons, Petitioner respectfully requests that the Court decline to adopt the recommendation that her habeas petition be denied.

Petitioner respectfully requests that the Court:

1. grant appropriate habeas relief, including release under reasonable conditions, taking into account Petitioner's prolonged detention and current documented medical needs, including the previously submitted gynecological surgery order, need for continuous monitoring, and cardiology referral following the August 3, 2026 medical episode;
2. permit Petitioner, if released under appropriate conditions, to obtain the surgery, specialist evaluation, follow-up treatment, and continuity of medical care

Petitioner respectfully submits that these circumstances should be considered as they exist now.

Petitioner is not asking the Court to terminate or prevent lawful removal proceedings. She seeks relief from continued detention so that her immediate medical needs can be appropriately addressed.

Petitioner therefore respectfully requests that the Court sustain these objections, decline to adopt the recommendation of denial, and grant release under reasonable conditions or such other appropriate relief as the Court deems just.

Respectfully submitted,

Ijeoma M.C.
Petitioner, Pro Se

Date: _____