

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

AXEL CAMPOS-FLORES,

Petitioner,

v.

PAMELA BONDI, et al.,

Respondents

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Civil No. 3:25cv797-MHL

RESPONSE TO ORDER TO SHOW CAUSE

Petitioner, Axel Campos-Flores, by and through undersigned counsel, hereby responds to the Court's October 30, 2025, Order to Show Cause as to why the Amended Petition was not timely filed and why the Court should accept it as timely nunc pro tunc. *See* PACER electronic docket, *Campos-Flores v. Bondi, et al*, No. 3:25-CV-797, docket entry 12.

On October 17, 2025, this Court granted the Petitioner's Motion for Extension of Time to file Amended Petition for Writ of Habeas Corpus. *See* PACER electronic docket, *Campos-Flores v. Bondi, et al*, No. 3:25-CV-797, docket entry 8. That same day (after business hours), staff at Griffith Immigration law sent the First Amended Petition for Writ of Habeas Corpus to Mr. Campos-Flores by electronic mail. Staff sent the document to the email address provided by the Abyon-Farmville Detention Center, where Mr. Campos-Flores is detained.

On the morning of the next business day, a staff member assigned to the Law Library at Abyon-Farmville Detention Center responded that the document would be delivered to Mr. Campos shortly.

When no document had arrived at Griffith Immigration Law by United States or electronic mail, staff at Griffith Immigration Law made further inquiry with the facility on October 29, 2025. A staff member at the detention center's Law Library responded by telephone that staff at the facility had forgotten to return the signed document. Staff at the library then promptly sent the signed document by email. Undersigned counsel filed the document with the Court that same day.

In sum, the untimely filing of the First Amended Petition for Writ of Habeas Corpus resulted from an administrative oversight at the detention facility. In his First Amended Petition for Writ of Habeas Corpus, Petitioner raises significant issues pertaining to the legality of the Respondents' detention of him. He asks that the Court hear and consider these issues and to treat his First Amended Petition for Writ of Habeas Corpus as timely nunc pro tunc.

CONCLUSION

For the foregoing reasons, Petitioner Campos-Flores requests that this Court treat his First Amended Petition for Writ of Habeas Corpus as timely nunc pro tunc.

Respectfully submitted,

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Attorneys for Petitioner

Dated: October 31, 2025

CERTIFICATE OF SERVICE

I hereby certify that on the thirty-first day of October, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. Counsel for the Respondents participates in CM/ECF and will be served electronically through that system.

s/ Khalid A. Shekib

Khalid A. Shekib, Esq.
Attorney for Petitioner