U.S. Department of Justice

United States Attorney for the
Southern District of New York

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November 29, 2025

VIA ECF
Hon. Jeannette A. Vargas
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *McDonald v. Francis et al.*,
No. 25 Civ. 9355 (JAV)

Dear Judge Vargas:

This Office represents LaDeon Francis, Kristi Noem, and Pam Bondi (the "Government") in connection with the petition for writ of habeas corpus ("Petition") filed on behalf of Shawnet Nickesha McDonald ("Petitioner"). ECF No. 1. On November 26, 2025, the Court granted the Petition and ordered the Government to transport Petitioner back to the Southern District of New York by November 29, 2025, and to certify compliance with the Court's order by December 1, 2025. ECF No. 20. I write respectfully to provide the Court with a status report. In short, ICE has informed this Office that, while it had made arrangements to transport Petitioner back to this District by November 29, due to an error explained below, Petitioner now will not arrive in the District until November 30.

In accordance with the Court's order, ICE had made arrangements for Petitioner to take an ICE Air flight from Alexandria, Louisiana to Mesa, Arizona on November 28, 2025, at 4:00 PM CST. She was then scheduled to take an ICE Air flight from Mesa, Arizona to Newark, New Jersey on November 29, 2025, at 6:30 AM MST, after which she would be transported to and released within the Southern District of New York.

Due to a large number of detainees in movement at Alexandria, which services eight ICE detention facilities in the New Orleans area and serves as a staging area for removal flights, ICE personnel in Louisiana did not place Petitioner on her scheduled outgoing flight to Mesa, Arizona on November 28, 2025. Upon realization of this oversight, ICE immediately scheduled Petitioner on the next flight from Louisiana to the New York City area. Petitioner is now scheduled to depart Alexandria, Louisiana at 9:00 AM on November 30, 2025, and arrive in Newark, New Jersey at approximately 12:30 PM EST. ICE has also confirmed that Petitioner is on the list of individuals scheduled to leave the facility on November 30, 2025. The Government will provide a further status report by December 1, 2025.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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cc: Counsel of Record (by ECF)