

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**ZAID A M ALYAMANI,
PETITIONER,**

V.

**PAMELA BONDI, ET AL.,
RESPONDENTS.**

§
§
§
§
§
§
§

NO. 3:26-CV-00051-KC

**FEDERAL RESPONDENTS' EMERGENCY MOTION TO ALLOW MOVEMENT OF
PETITIONER OUTSIDE THE WESTERN DISTRICT OF TEXAS FOR PURPOSES OF
REMOVAL**

STATEMENT OF ISSUES

1. Whether Respondents should be granted permission to allow the transfer of Petitioner to a staging facility outside the El Paso Division of the Western District of Texas in order to facilitate flight arrangements and effectuate Petitioner's removal from the United States.

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW, the Federal Respondents in this case and file this Emergency Motion to Allow Movement of Petitioner, Zaid A M Alyamani, Outside the Western District of Texas for Purposes of Removal. In support of this motion, Respondents would respectfully show the Court the following:

I. Introduction

1. Respondents submit this emergency motion to allow movement of the Petitioner to a location outside the Western District of Texas in order that Petitioner may be placed on a charter flight to facilitate removal from the United States.

II. Procedural History

2. Proceeding *pro se*, Petitioner filed a Petitioner for Writ of Habeas Corpus on January 15, 2026. ECF No. 3
3. On January 15, 2026, the Court granted Petitioner's motion for leave to proceed in forma pauperis and ordered the Respondents to show cause why the application should not be granted and to provide responses to specific inquiries by the Court regarding the steps taken and to be taken to effectuate Petitioner's removal. ECF No. 2, at 5. As part of the order, the Court prohibited the transfer of Petitioner to any facility outside the boundaries of the El Paso Division of the Western District of Texas, until the Court orders otherwise, unless Petitioner is lawfully removed from the United States. ECF No. 2, at 6.
4. On January 22, 2026, Respondents filed their response to the Petition for Writ of Habeas Corpus. ECF No. 6. In support of the response, Respondents submitted a Declaration from Acting Assistant Field Office Director, Maria E. Estrada

(“Declarant”). ECF No. 6-1. Therein, the Declarant explained that on June 11, 2025, Petitioner was ordered removed to the Palestinian Territory. *Id.* at ¶ 13.

III. Argument

5. Respondents now file the instant emergency motion to allow the transfer of Petitioner to a staging facility outside the Western District of Texas, in order that Petitioner may be placed on a charter flight to effectuate removal from the country. In support of this motion is the Declaration of Maria E. Estrada, Acting Assistant Field Office Director, familiar with the removal proceedings of the Petitioner. *See* Exh. A, Declaration.
6. Time is of the essence to preserve Petitioner’s place on the available charter flight and effectuate the removal safely and efficiently. The available staging facility is at a location between 500 and 1000 miles from El Paso, Texas.
7. In the event Petitioner is transferred to the staging facility but removal cannot be accomplished as planned, arrangements would be made to promptly return Petitioner to the El Paso Division of the Western District of Texas.
8. Although the Court ordered that Petitioner not be transferred out of El Paso, Respondents seek permission from the Court to allow Petitioner’s transfer to a staging facility to effectuate removal and for no other reason or delay.

IV. Conclusion

WHEREFORE, premises considered, Respondents respectfully request that the Court grant its emergency motion and allow the transfer of Petitioner to a staging facility outside the Western District of Texas in order to effectuate removal out of the United States. In the event Petitioner’s removal is not successful, Petitioner will be promptly returned to the El Paso Division of the Western District of Texas.

Dated: January 27, 2026

Justin R. Simmons
United States Attorney

/s/ Deborah L. Fischer
Deborah L. Fischer
Assistant United States Attorney
Texas Bar No. 00786039
700 E. San Antonio Ave., Ste. 200
El Paso, Texas 79901
(915) 584-6884 (phone)
Deborah.Fischer@usdoj.gov

Certificate of Service

I certify that on January 27, 2026, I mailed a copy of this Federal Respondents' Emergency Motion to Allow Movement of Petitioner Outside the Western District of Texas for Purposes of Removal to Petitioner (*pro se*) at the following address:

Zaid A M Alyamani



El Paso Service Processing Center
8915 Montana Ave.
El Paso, Texas 79925
PRO SE

/s/ Deborah L. Fischer
Deborah L. Fischer
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

Zaid A M Alyamani,
Petitioner,

v.

Pamela Bondi, *et al.*,
Respondents.

§
§
§
§
§
§
§

No. 3:26-cv-00051-KC

ORDER

CAME ON TO BE CONSIDERED, Federal Respondents' Emergency Motion to Allow Movement of Petitioner Outside the Western District of Texas for Purposes of Removal in the above-styled and numbered cause, and the Court having considered the Motion, is of the opinion that it should be **GRANTED**.

IT IS, THEREFORE, ORDERED that the Federal Respondents' Emergency Motion to Allow Movement of Petitioner Outside the Western District of Texas for Purposes of Removal is GRANTED. If Petitioner is not removed from the United States he will be returned to the El Paso Division of the Western District of Texas.

SIGNED and **ENTERED** this ____ day of _____, 2026.

KATHLEEN CARDONE
UNITED STATES DISTRICT JUDGE