

United States District Court
Western District of Texas
El Paso Division

Reinaldo Moreno-Rodriguez,
Petitioner,

v.

No. 3:26-CV-00084-DCG

Warden, in his or her official capacity as
Warden of the ERO El Paso Camp East
Montana Detention Center, *et al.*,
Respondents.

Federal Respondents' Advisory to the Court

Federal Respondents file this advisory to notify the Court of Petitioner's removal status and respond to the Court's inquiries, per the Court's Order of April 14, 2026. ECF No. 16. In support of this advisory, Respondents submit the attached declaration from Venessa Martinez, Supervisory Detention and Deportation Officer, to address the specific inquiries from the Court. *See* Exh. A, Declaration. The Court has inquired:

1. How long do Respondents anticipate that it will take to effect Petitioner's removal?

The anticipated timeline for removal is currently unknown. *Id.* at ¶ 8.

2. To which country will Petitioner be removed?

Petitioner has failed to comply with removal to Mexico under the Cuba, Venezuela, Nicaragua, and Haiti (CVNH) repatriation agreement. *Id.* at ¶ 6. ERO El Paso will be transferring Petitioner back to ERO Miami to continue with third country removal efforts. *Id.* at ¶ 7.

Dated: April 21, 2026

Respectfully submitted,

Justin R. Simmons
United States Attorney

By: /s/ Deborah L. Fischer

Deborah L. Fischer
Assistant United States Attorney
Texas Bar No. 00786039
700 E. San Antonio, Suite 200
El Paso, Texas 79901
(915) 534-6884 (phone)
Deborah.Fischer@usdoj.gov
Attorneys for Federal Respondents