

United States District Court
Western District of Texas
El Paso Division

ESMAEL RAJABI,
Petitioner,

v.

Pam Bondi, et al.,
Respondents.

No. 3:26-CV-00130-KC

**Federal Respondents' Response
to Order to Show Cause**

Federal Respondents submit this response to the Court's Order ECF No. 12. Attached to this response is Exhibit A, which has all the facts that Federal Respondents reference in support of this Response. Iran informed ERO that they are verifying Petitioner's citizenship and ERO has recently asked for an update. Ex. A, Decl. Travel documents have not been issued from Iran yet. *Id.* Currently, because of recent airspace closures, charter flight missions have been paused. *Id.*

Date: March 12, 2026

Respectfully submitted,

JUSTIN R. SIMMONS
UNITED STATES ATTORNEY

By: /s/ Adrian Acosta

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Certificate of Service

On February 3, 2026, I directed a copy of this response to be mailed to Petitioner at the below address:

Esmael Rajabi
A# 
El Paso Service Processing Center
8915 Montana Ave.
El Paso, TX 79925

/s/ Adrian Acosta
Adrian Acosta
Assistant U.S. Attorney