

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

ESMAEL RAJABI,
Petitioner,

v.

Pam Bondi, Attorney General, et al.,
Respondents.

No. 3:26-CV-00130-KC

Petitioner's Response to Federal Respondents'

The Petitioner, Esmael Rajabi, has now been detained for almost 9 months after Immigration and Customs Enforcement (ICE) revoked his Order of Supervision (OSUP) without cause. The Respondents have not provided any evidence to show that there is a likelihood of removal in the reasonable foreseeable future.

The Petitioner is 73 years old and the prolonged detention is continuing to cause irreparable harm. Prior to his current detention he was on OSUP and has complied with all the requirements. The Respondents themselves have not stated that the current detention is necessary in order to execute removal when and if Travel Documents (TD) become available. ICE can easily re-detain the Petitioner if TD will be secured for the Petitioner.

History of Government Updates

On February 11th, 2026 this Court ordered the Respondents to file a Status Report. Government Exhibit A, "Declaration of Acting Assistant Field Office Director Veronica Molina", states at ¶ 8 that the Respondents requested TD from HQ RIO but were told that the request for information remains pending. In ¶ 10 the Respondents state that they cannot anticipate a timeline for issuance of a TD but are following up every two weeks.

On March 12th, 2026 this Court ordered for the Respondents to file another Status Report. Government Exhibit A, "Declaration Update of Supervisory Detention and Deportation Officer Gilberto Salazar", states at ¶ 8 that TD have not been issued. In ¶ 9 the Respondents stated that Iran

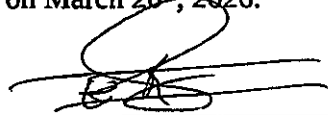
was issuing TD in accordance with charter flight mission; however, missions have been paused due to recent airspace closure.

Petitioner's Plea with this Court

I, Esmael Rajabi, Petitioner understand that the Court has ordered for the Respondents to file another Status Report by March 27th, 2026. I respectfully bring to the Courts attention that the previous two Status Reports did not express any changes nor evidence that there is likelihood of removal in the reasonable foreseeable future. My detention is only being prolonged, and as of recent developments with the United States and Iran conflict there is no likelihood that the Respondents will be able to execute removal to Iran.

I plea with this Honorable Court to grant me relief. I am in my older years and this detention is weighing heavily on me. Once this Court's respected order of a Status Report is met by the Respondents by March 27th, 2026 and if I am still not removed to Iran I ask for this Court to Order my Immediate Release. Or in the alternative, to give the Respondents no more than 2 more weeks to either remove me or to release me. Thank you.

I affirm, under penalty of perjury, that the foregoing is true and correct. Respectfully submitted this
on March 20th, 2026.



Esmael Rajabi, *Pro Se*



El Paso SPC

8915 Montana Ave

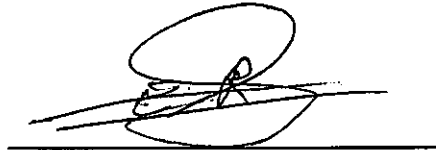
El Paso, Texas 79925

CERTIFICATE OF SERVICE

I, Esmael Rajabi, certify that a true copy of the above document (Petitioner's Response to Federal Respondents') was served on March 20th, 2026 upon the following:

Western District Court of Texas
Albert Armendariz, Sr. United States Courthouse
525 Magoffin Avenue
Room 105
El Paso, Texas 79901

by placing a copy of the above in the mail system at the facility where I am detained.



Esmael Rajabi, *Pro Se*



El Paso SPC
8915 Montana Ave
El Paso, Texas 79925



PRESS FIRMLY TO SEAL

PRIORITY MAIL
FLAT RATE ENVELOPE
POSTAGE REQUIRED

FILED

PRIORITY®
Retail MAIL

MAR 23 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY: [Signature]
DEPUTY CLERK



**UNITED STATES
POSTAL SERVICE®**

**PRIORITY®
MAIL**

VISIT US AT [USPS.COM](https://usps.com)®
ORDER FREE SUPPLIES ONLINE

GE PAID

5

Origin: 79910
03/20/26
4828450105-21

apply)*

International destinations.

IL®

0 Lb 1.90 Oz required.

RDC 03 is see the

3/26

tions of coverage. 2024

C015

FROM:

ESMAEL Rajabi

8915 Montana Ave.
El Paso, TX 79925

TO: WESTERN District of Texas
U.S. Court
525 Magallon Ave.
Room 105
El Paso, TX 79901

le free Package Pickup,
an the QR code.

Label 228, December 2023

FOR DOMESTIC AND INTERNATIONAL USE

PS.COM/PICKUP

This packaging is the property of the U.S. Postal Service® and is provided solely for use in sending Priority Mail® and Priority Mail International® shipments. Misuses may be a violation of federal law. This package is not for resale. EP14F © U.S. Postal Service; July 2022; All rights reserved.