

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

ESMAEL RAJABI,
Petitioner,

v.

No. 3:26-CV-130-KC

PAM BONDI, *et. al.*,
Respondents.

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

Federal Respondents submit this response to the Court's Order. Attached to this response is Exhibit A, which has all the facts that Federal Respondents reference in support of this Response. The Detention and Deportation Officer (DDO) at HQ RIO assigned to the removal division for the Middle East/Europe remains in contact with the officials at the Interests Section to Iran. The Interests Section to Iran has not confirmed which individuals were scheduled to receive travel documents for the cancelled charter flight. The DDO advised that based on their training and experience, travel documents and passports are typically issued in accordance with charter missions. The officials in Washington D.C. receive their instructions directly from their counterparts in Tehran. HQ RIO cannot advise on the status of the airspace closure because ICE did not initiate that action. However, once the airspace reopens HQ RIO anticipates removals to the area will resume as normal.

Respectfully submitted,

JUSTIN R. SIMMONS
UNITED STATES ATTORNEY

/s/ Adrian Acosta

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CERTIFICATE OF SERVICE

On or about March 27, 2026, I directed a copy of this filing to be mailed via US Certified Mail to the Pro Se Petitioner at the below address:

Esmael Rajabi

A 

El Paso Service Processing Center
8915 Montana Avenue
El Paso, TX 79925

/s/ Adrian Acosta

ADRIAN ACOSTA
Assistant United States Attorney