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In the United States District Court
for the Middle District of Georgia
Columbus Division

Faridullah Liwan Khil.
A: [redacted]

Case No. 4:26-cv-698-CDL-CHW
28 U.S.C.§2241

First, I must sincerely thank the members of this Court for granting my request for an extension and a copy of the motion to dismiss filed by the defendants.

Response to motion to dismiss issued by defendants' representatives on may 19, 2026

On May 19, 2026, the defendants filed a motion to dismiss with this Court. This motion argues that in the habeas corpus motion I filed on April 27, 2026, no evidence could be provided to demostrate that DHS-ICE could not remove me to Afghanistan or Brazil.

It is my opinion that the defendants' representation is trying to divert attention from the essence of the habeas corpus motion, although it mentions Zadvydas v. Davis, it does not do so with the purpose of imitating a similar litigation, if not as a reference, because of this case there is now a law that limits indefinite detention to a maximun of 180 days for those detained while awaiting deportation. This time limit was determined stipulated and ordered by the Supreme Court, following the litigation Zadvydas v. Davis. In my habeas corpus motion, the claim is the violation of the time limit stipulated by the Supreme Court since 2002, through the case Zadvydas v. Davis, 533U.S.C.678(2001).

The defendants' representation also mentions and uses as a reference the Mirza case, 2023WL 2664860, at*1-2. Yet, and also many other cases. But this makes no reference to any case that refers to Afghan citizens.

I must remind you that Mirza is a Rwanda citizen, a country with a completely different international policy regarding the United States than Afghanistan, and to suggest that the Afghan government could provide travel documents after a certain period of time, as happened with the Rwandan government, is completely speculative.

The Supreme Court was very clear in its decision, establishing a time limit of a maximun of 180 days for indefinite detentions for deportation purposes, except for case that represent a public safety or a flight risk. The defendants' legal representation makes no mention of these exceptions because they are aware that they would not apply in my case, due to my "zero" criminal record.

This detention for more than 28 months, without having commited a real crime, has done irreparable damage on me, taking away time that I will never recover. This negative impact not only affects me, but also my entire family and people close to me.

I am not qualified, nor do I believe I have sufficient knowledge to criticize the work of DHS-ICE in its efforts to fulfill its duty to remove me from United States within the time established by law, but I am fully aware that I have every right to demand that the law be enforced and to claim my civil rights and freedom as stated in the 5th Amendment to the United States Contitution, wich have been and continue to be violated by the defendants to this day.

I respectfully request that this Court enforce the Law that establishes a time limit for indefinite detention and order my immediate release, and deny any other action that the defendant may take against me.

I affirm under penalty of perjury, that the foregoing is true and correct. Respectfully this June 30, 2026.

Fridullah Liwan Khil. Pro-se
[redacted]
SDC
P.O.Box 248
Lumpkin, GA 31815