



U.S. Department of Justice
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July 22, 2020

VIA ELECTRONIC FILING

Honorable Mark Langer
Clerk of Court
United States Court of Appeals for the District of Columbia Circuit
Washington, DC 20001

Re: *Hassoun v. Searls*, Case No. 20-5191
Appellant's Notice of Removal

Dear Mr. Langer,

The Government notifies the Court that on July 21, 2020, U.S. Immigration and Customs Enforcement (ICE) removed Appellee-Petitioner Adham Amin Hassoun from the United States to a third country. *See* July 22, 2020 Marlen Piñeiro Decl. ¶ 5 (attached). Mr. Hassoun is no longer in ICE custody or within the United States. Piñeiro Decl. ¶ 6.

The Government will, in due course, file a submission with the Court addressing the impact of Mr. Hassoun's removal on this appeal. The Government advises the Court that, given Mr. Hassoun's removal, the Court need not rule on the Government's pending stay motion and that the Government does not intend to file a reply supporting that stay motion.

Sincerely,

/s/ Anthony D. Bianco

Anthony D. Bianco
Senior Counsel for National Security
United States Department of Justice
Office of Immigration Litigation

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

ADHAM AMIN HASSOUN,

Petitioner,

Case No. 1:19-cv-00370-EAW

v.

JEFFREY SEARLS, in his official capacity
as Acting Assistant Field Office Director and
Administrator, Buffalo Federal Detention
Facility,

Respondent.

DECLARATION OF MARLEN PIÑEIRO

I, Marlen Piñeiro, in accordance with 28 U.S.C. § 1746, declare as follows:

1. I am employed by the U.S. Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), as the Assistant Director for Removal. ERO's Removal Division, located at ICE Headquarters in Washington, D.C., is responsible for assisting ERO's field offices in obtaining travel documents necessary to execute administratively final orders of removal, as well as coordinating, managing, and facilitating the return/removal of aliens from the United States. I have been permanently employed with ICE and the former Immigration and Naturalization Service since 1987, and I have been serving in my current position since December 2013.
2. My present duties include complete oversight of removal operations to include travel document procurement and ICE Air Operations.

3. This declaration is based upon my personal knowledge, information provided to me in my official capacity, and information obtained from records maintained by DHS. This declaration is an update to information provided in ICE's July 16, 2020 declaration.
4. I am familiar with the removal case of Adham Hassoun, Alien Number: A074-079-095. While in ICE custody, he was detained at the Buffalo Federal Detention Facility (BFDF) in Batavia, New York.
5. On July 21, 2020, ICE successfully removed Hassoun pursuant to his final order of removal from the United States to a third country via ICE Air charter flight.
6. At this time, Hassoun is no longer in ICE custody or within the United States.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief, and based upon records maintained in the ordinary course of business.

Executed on this 22nd day of July 2020 in Washington, D.C.



Marlen Piñeiro
Assistant Director for Removal
ICE Enforcement and Removal Operations