

Immigration and Nationality Act (“INA”), 8 U.S.C. § 1227(a)(1)(B). Specifically,

an automatic stay, the INS Deportation Office began preparations to remove Petitioner to Trinidad. Resp. Supplement Ex. pps. 2-3. Such preparations included obtaining travel documents from the Embassy of Trinidad. In February 2001, the Acting Assistant Director for Detention and Deportation, Bruce Norum, met with Petitioner to execute the necessary documentation to obtain clearance to enter that country. Resp. Supp. Ex.; Norum Decl. ¶ 9. Mr. Norum states that before he would complete such paperwork, Petitioner insisted that he consult with counsel. Id. After such consultation, Petitioner completed the paperwork, and the Embassy of Trinidad issued an emergency travel certificate on March 12, 2001.

found guilty of a felony if a deported alien attempted to reenter the US. Id. The court refused to presume these consequences, however, in light of the Supreme Court's holding in Spencer. Id. Instead, following the reasoning of the Tenth

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corpus under § 2241 was not repealed and therefore remained available to aliens to raise pure questions of law.

In this case, given that Petitioner is no longer in custody, the only issues that remain for consideration concern the merits of the removal order, and the execution of the removal order. With regard to the merits of the removal order, if such challenge involved a pure question of law, Petitioner could arguably bring such challenge in a habeas petition. However, the challenges raised by Petitioner do not involve pure questions of law. The removal order at issue was entered based on the Immigration Judge's determination that Petitioner did not make the trip to Florida for his sister.

If this Court genuinely believed that the Respondent had left Minnesota toTj 0 -28u9.252 T

