



Cecillia D. Wang
National Legal Director

May 6, 2026

Mr. Danny Bickell
Deputy Clerk
Supreme Court of the United States
Washington, D.C. 20543

Re: *Genalo v. Black*, No. 25-886

Dear Mr. Bickell:

I write to memorialize our conversation earlier today.

On April 28, 2026, I filed a Suggestion of Mootness concerning one of the two Respondents in the above-captioned case, Mr. Carol Williams Black. On the same date, I filed a Brief in Opposition to the Petition for Writ of Certiorari, on behalf of both Respondents, Mr. Black and Mr. G.M.

Thank you for informing me that under Supreme Court Rule 15.4, our filing of both a Suggestion of Mootness and a Brief in Opposition was irregular, and that the Clerk's Office therefore will remove the Suggestion of Mootness from the docket. I regret that I did not consult with you prior to filing on the best way to handle this unusual circumstance where the Petition is moot as to one of the two Respondents.

The cross-references in the Brief in Opposition to the Suggestion of Mootness can be disregarded. The Brief in Opposition already includes the facts and legal arguments establishing why the Petition is moot as to Mr. Black.

The declarations originally submitted in support of the Suggestion of Mootness, by Mr. Black (Exhibit 1) and his immigration counsel (Exhibit 2), are attached here. These document the relevant jurisdictional facts.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cecillia D. Wang". The signature is fluid and cursive, with the first name "Cecillia" being more prominent and the last name "Wang" following in a similar style.

Cecillia D. Wang
Counsel of Record for Respondents

EXHIBIT 1

I, Carol Black, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I arrived in the United States in 1983 as a Lawful Permanent Resident.
2. After over 40 years in the United States, in June of 2025, my wife and I made the difficult decision to leave the United States.
3. Prior to departing, I sold my home and my business.
4. I am now residing permanently abroad, living in Trinidad part of the time and in Jamaica the remainder.
5. I have no intention of returning to the United States.

I, Carol Black, declare under penalty of perjury that the following is true and correct.

Dated: April 13, 2026


Carol Black

EXHIBIT 2

I, Mitchell Laird, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney barred in the State of New York and the founder of Laird Law, PLLC, where I provide immigration representation, among other services.
2. I represented Carol Black in his immigration proceedings, including in his appeal of his removal order before the Board of Immigration Appeals (“BIA”).
3. After Mr. Black notified me he had voluntarily left the country, I filed a motion to withdraw his appeal before the BIA. A true and correct copy of this motion is attached as Exhibit A.
4. On March 30, 2026, the BIA granted this motion. A true and correct copy of this order is attached as Exhibit B.

I, Mitchell Laird, declare under penalty of perjury that the following is true and correct.

Dated: April 27, 2026



Mitchell Laird

EXHIBIT A

Mitchell Laird, Esq.
291 Broadway, Suite 802
New York, NY 10013
(212) 233-2988
FAX (212) 233-2966

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
BOARD OF IMMIGRATION APPEALS**

In the Matter of

Carol Williams Black

In Removal Proceedings

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)
)
)
)

File No.



MOTION TO WITHDRAW APPEAL

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
BOARD OF IMMIGRATION APPEALS
NEW YORK, NEW YORK

-----X
In the Matter Of

BLACK, CAROL
[REDACTED]

IN REMOVAL PROCEEDINGS

Respondent
-----X

MOTION TO WITHDRAW APPEAL

Comes now Respondent, **Carol Black**, by counsel, and moves this Board to withdraw his appeal of his prior removal order. As grounds for this Motion, counsel for Respondents state the following:

1. Respondent filed an appeal on his Order of Removal on July 21, 2023.
2. Respondent, through counsel, submitted a brief on May 31, 2024.
3. DHS subsequently filed their brief on June 18, 2024.
4. Since the brief was filed, Respondent left the United States. He sold his home and is now permanently living abroad.
5. Counsel respectfully requests that this Honorable Board permit the withdrawal of his appeal, as he has effectively been removed and no longer intends to pursue his case.
6. Undersigned Counsel was unable to obtain DHS' position on this motion; however, by information and belief, approval of this motion would not

prejudice DHS as the removal order will become final and has already been effectuated.

WHEREFORE, for all of the above reasons, Respondent respectfully requests that the Board accept the late-filed Appeal in this case.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Mitchell Laird", is written over a horizontal line.

Mitchell Laird, Esq.
291 Broadway, Suite 802
New York, NY 10007
(212) 233-2988
FAX (212) 233-2966

BLACK, CAROL
[REDACTED]

PROOF OF SERVICE

On February 5, 2026, I, Mitchell Laird, Esq., served in person a copy of the foregoing Brief for Respondent to the Office of the District Counsel/NYC by e-filing at the following address:

201 Varick Street, Room 738
New York, NY 10014



Mitchell Laird, Esq.



Date

**United States Department of Justice
Executive Office for Immigration Review
Board of Immigration Appeals
5107 Leesburg Pike, Suite 2000
Falls Church, VA 22041**

In the Matter of Carol Williams Black [REDACTED]

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of respondent's Motion to Withdraw Appeal, it is
HEREBY ORDERED that the motion be ☐ GRANTED ☐ DENIED because:

- ☐ DHS does not oppose the motion.
- ☐ The respondent does not oppose the motion.
- ☐ A response to the motion has not been filed with the court.
- ☐ Good cause has been established for the motion.
- ☐ The court agrees with the reason stated in the opposition to the motion.
- ☐ The motion is untimely per _____.
- ☐ Other.

Deadlines:

- ☐ The application(s) for relief must be filed by _____.
- ☐ The respondent must comply with DHS biometrics instructions by _____.

Date

Honorable Immigration Judge

Certificate of Service

This document was served by: ☐ Mail ☐ Personal Service

To: ☐ Alien ☐ Alien c/o Custodial Officer ☐ Alien's Atty/Rep ☐ DHS

Date: _____ By: Court Staff: _____



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Date Received: 02-05-2026 5:50:19 pm

Subject: BLACK, CAROL WILLIAMS files: Motion to Withdraw Appeal.pdf

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The eService Team...

EXHIBIT B



U.S. Department of Justice

Executive Office for Immigration Review

*Board of Immigration Appeals
Office of the Clerk*

5107 Leesburg Pike, Suite 2000
Falls Church, Virginia 22041



**Laird, Mitchell
Law Office of
291 Broadway
Suite 802
New York NY 10007**

**DHS/ICE Office of Chief Counsel - NYV
201 VARICK STREET, STE 738
New York NY 10014**

Name: BLACK, CAROL WILLIAMS



Date of this Notice: 03/30/2026

Enclosed is a copy of the Board's decision and order in the above-referenced case.

Sincerely,

A handwritten signature in black ink, appearing to read "John Seiler".

John Seiler
Acting Chief Clerk

Enclosure

Userteam: Docket

NOT FOR PUBLICATION

**U.S. Department of Justice
Executive Office for Immigration Review
Board of Immigration Appeals**

MATTER OF:

Carol Williams BLACK, [REDACTED]

Respondent

FILED

Mar 30, 2026

ON BEHALF OF RESPONDENT: Mitchell Laird Esquire

ON BEHALF OF DHS: Edward P. Lombardo, Assistant Chief Counsel

IN REMOVAL PROCEEDINGS

On Appeal from a Decision of the Immigration Court, New York, NY

Before: Hansell, Appellate Immigration Judge

HANSELL, Appellate Immigration Judge

ORDER:

The respondent has filed a motion to withdraw his appeal of the Immigration Judge's June 20, 2023, decision. *See* 8 C.F.R. § 1003.4. The Department of Homeland Security has not filed a response. The respondent's motion is hereby granted, and the record is returned to the Immigration Court without further action.

NOTICE: If a respondent is subject to a final order of removal and willfully fails or refuses to depart from the United States pursuant to the order, to make timely application in good faith for travel or other documents necessary to depart the United States, or to present himself or herself at the time and place required for removal by the Department of Homeland Security, or conspires to or takes any action designed to prevent or hamper the respondent's departure pursuant to the order of removal, the respondent shall be subject to a civil monetary penalty of up to \$998 for each day the respondent is in violation. *See* section 274D of the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1324d; 8 C.F.R. § 280.53(b)(14). Further, any respondent that has been denied admission to, removed from, or has departed the United States while an order of exclusion, deportation, or removal is outstanding and thereafter enters, attempts to enter, or is at any time found in the United States shall be fined or imprisoned not more than two years, or both. *See* INA § 276(a), 8 U.S.C. § 1326(a).