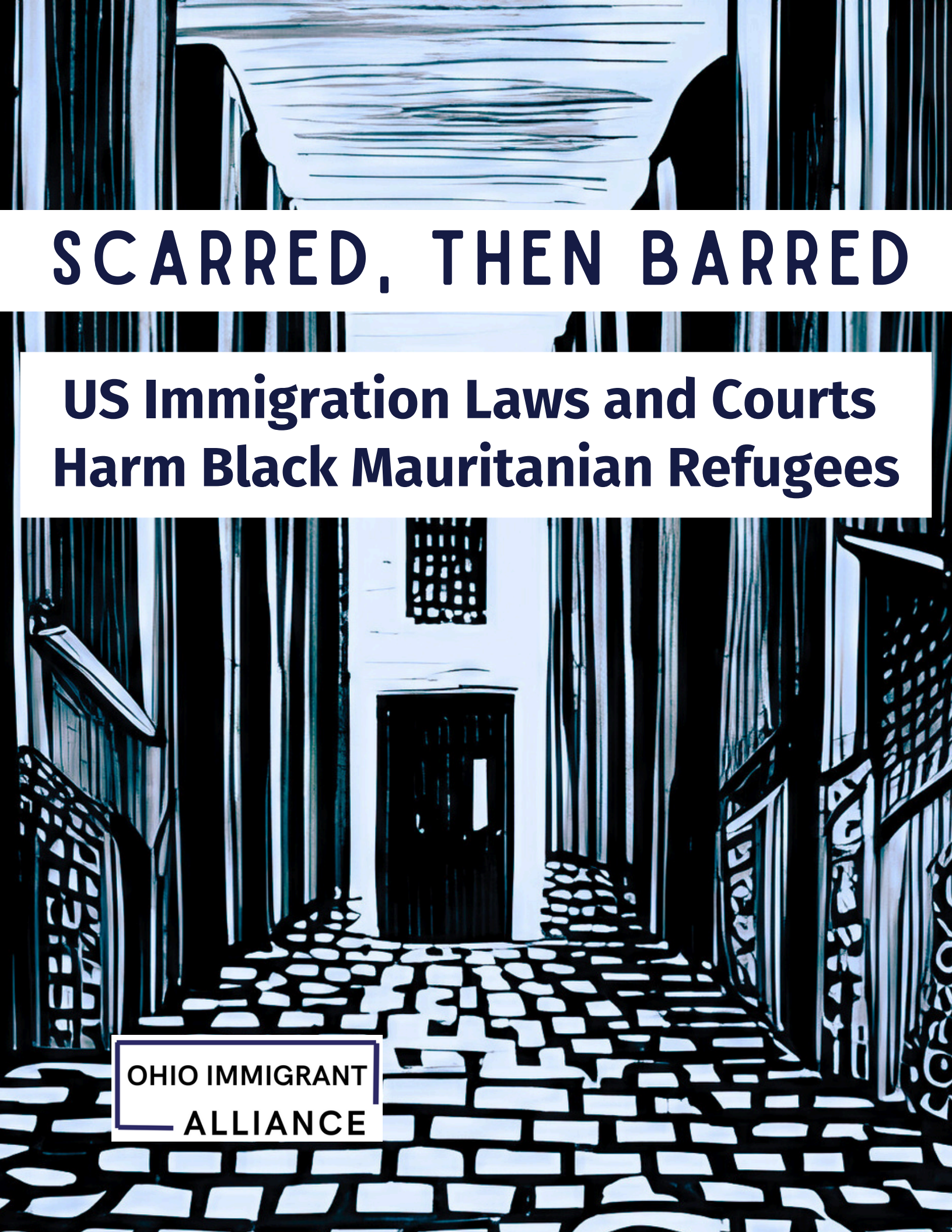

SCARRED, THEN BARRED

US Immigration Laws and Courts Harm Black Mauritanian Refugees

OHIO IMMIGRANT ALLIANCE

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Content Warning: torture, violence, murder, racism, family separation

"Anybody who can hear me — I'm here in Mauritania. I'm here in a closet. Anyone in the United States who can hear me, help me to get out of this place, the most dangerous country in this world.... Mauritanians anywhere in the world should be protected." — Black Mauritanian man who was deported after living in the US for decades ("Help me to get out of this most dangerous country")

Listen to more testimonies from Black Mauritanians denied asylum here and in this digital press release.

This case study outlines reasons people who meet the definition of a "refugee" under international and U.S. law are denied protection in the dysfunctional U.S. immigration courts. Judges' accusations of "lying" and "fraud" are often based on bias, not evidence. They fail to understand a country's political history and even their government-issued identity documents, making decisions based on false assumptions. **Once a person is deemed "not credible" by an immigration judge, appellate judges tend to defer to that finding, no matter how wrong the reasoning may be.**

While some Black Mauritanians have obtained asylum over the years, there is a stark gap between those who had competent and consistent legal counsel and those who did not. And, even genocide survivors with good lawyers have been (and are being) deported.

Many of the cases that follow involve Black Mauritanians appearing in the New York, Chicago, and Cleveland immigration courts during the first two decades of the 21st century. However, the systemic injustices remain alive today, and are also faced by Black immigrants from other countries. **In fact, additional barriers to asylum have been added in recent years, like the Biden administration's "transit" ban.**

The Biden asylum ban, introduced in 2023, creates a "rebuttable presumption of *ineligibility* for asylum," meaning that people requesting asylum are assumed to be ineligible from the outset, a "stark departure from decades of U.S. asylum policy." Unless someone was able to apply for an appointment at the border using the notoriously bug-ridden, anti-Black CBPOne mobile app, they will likely be found ineligible for asylum under the Biden ban. The only exceptions are people who arrive as children, or who had applied for asylum in another country along the journey and been denied. Given the racism and lack of functioning asylum systems in countries along the way to the U.S., Biden's asylum ban is a ticking time bomb for Black Mauritanians, and others.

NATION Immigrants Add Topic

'Guilty until proven innocent'? Advocates say Black immigrants face racial bias in court

Danae King
USA TODAY NETWORK

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Burn marks dot his abdomen.

A wound around his ankle from bindings is still healing, months after he escaped his imprisonment.

But the torture may not be over for the 34-year-old Mauritanian man, as immigration advocates are sounding the alarm about alleged racial discrimination in Ohio's only immigration court in Cleveland.

The East side man, who spoke on the condition of anonymity for fear of retribution and deportation, has been in the United States for three years. Before that, he was enslaved in his country.

"I live with uncertainty, which is torture inside of me because I'm living a life where I'm not sure if I will be granted asylum or be deported," he said, speaking with The Columbus Dispatch, part of the USA TODAY Network, in Fulani via an interpreter. "If I go back, the same thing that happened to me will happen again."

Excerpt from "'Guilty until proven innocent'? Advocates say Black immigrants face racial bias in court," Danae King, Columbus Dispatch, July 14, 2023. See also "Advocates: Complaint against immigration judge points to flawed accountability system," Yilun Cheng, Columbus Dispatch, January 15, 2022.

The consequences of an incorrect asylum denial can be life-altering: deportation, torture and continued persecution; the need to migrate again for safety; and even death. For examples, see "Black Mauritanians' Ongoing Search for Safety" (Ohio Immigrant Alliance); "Removals to Somalia in Light of the Convention Against Torture: Recent Evidence from Somali Bantu Deportees" (Georgetown Immigration Law Journal); and "'How Can You Throw Us Back?': Asylum Seekers Abused in the US and Deported to Harm in Cameroon" (Human Rights Watch).

Common injustices faced by Black Mauritanians in U.S. immigration courts include cultural ignorance; incorrect language interpreters; judges' lack of understanding about statelessness; bias and misinformation; fraudulent, incompetent, or non-existent legal advice; the "any reason to deny" mentality; and legal landmines embedded into law and policy.

Read on for numerous tragic examples of the injustices meted out by U.S. immigration courts on a daily basis, along with recommendation for building a fairer system.

Immigration judges may be ignorant about cultures, languages, and diverse cultural manifestations of trauma.

An immigration judge with a documented history of intimidation and racist remarks found D.A. "not credible" for two reasons. D.A.'s testimony was relayed through an Fulani interpreter. First, the judge said his testimony regarding his family's method of fleeing Mauritania by crossing the Senegal River was inconsistent, as he allegedly referred to having used a "canoe" and later said it was a "little boat." A canoe is a little boat, both in common English and Fulani (the word *laama*). And D.A. was a baby when his family fled. He was relaying a story he had been told, not one he remembered, and narrating his experience through an interpreter, who used English words that are synonyms when explaining it to the court. The idea that this is inconsistent testimony is absurd.

The judge also said that D.A., a Black Mauritanian, changed his testimony regarding torture he received at the hands of White Moors. She claimed that he described the order of the methods used differently at various times, saying he was burnt first, and then beaten at one point in his testimony, and later saying he was beaten first, and then burned.

If someone who had been tortured had a perfect recall of the experience some years later, and could narrate it in court, that would be a miracle. D.A.'s prolific body scars should have been evidence enough. But the judge had an "answer" for those too. She said, without any medical training or evidence, that perhaps D.A.'s skin is simply "the kind that scars easily."

Speaking through an interpreter, M.D. answered the judge and trial attorneys' questions directly and succinctly. He had witnessed his father's murder at the hands of White Moors during the genocide, and was marched at gunpoint to the Senegal River with the surviving members of his family. His story did not change, but the trial became increasingly antagonistic, with the government attorney demanding that M.D. provide evidence that he is Fulani and Black. M.D. plainly answered, "I am the evidence. I speak Fulani and I am Black."

Then the government attorney began to question whether M.D.'s birth certificate proved he was Mauritanian, because it only listed the city he was born in, not the country. The government attorney questioned whether the city was even in Mauritania—an easily verifiable and unchanged fact, whether written on the birth certificate or not.

The English transcript of M.D.'s hearing is riddled with "(unintelligible)" instead of the names of people and places. There was an interpreter in the room who could have spelled the words out to make the record more accurate and *credible*. Instead, the record shows big holes in place of material facts, while M.D. was accused of not providing "proof" that he is Black. The judge took the side of the government attorney and found M.D. "not credible."

Judges have also deemed Black Mauritanians "not credible" for:

Lacking birth certificates and other original records, which are often not issued to Black Mauritanians in their native country, and exceedingly difficult to obtain at a later date.

Mixing up dates. In some cultures, time is marked by events rather than the Gregorian calendar. Black Mauritanians may not ever know their true birthdays. Many are assigned a birthdate of December 31 of the year in which they were believed to have been born. They may have to memorize the dates of events like when they traveled to the U.S., political actions, arrests, marriages, and deaths before giving testimony in immigration court. Memorized facts are easy to forget or mix up in a high stakes environment like this.

"Misclassifying" family members according to U.S. social norms. In some cultures, "brother" and "sister"—even "mother" and "father"—are used to describe relationships beyond a biological, nuclear family. An immigration judge may probe these relationships and decide the applicant is lying if he refers to a family friend as a "brother," or an aunt as his "mother." They assume fraud when the applicant really just has a broader definition of family than many U.S. Americans.

Appearing "evasive" while giving testimony. Black Mauritanian culture is reserved. Humility and modesty are core values of their Islamic faith. Complaining—even when justified, as in the case of torture and genocide—is considered unholy. In fact, some English words that describe negative feelings, like "stress," do not even exist in Fulani. Talking about "feelings" is a foreign construct, which makes it extremely difficult for people who have survived humiliating tortures, and seen family members raped and killed, to talk about these horrors. Add to that the stress and intimidation of a U.S. courtroom, a proceeding taking place almost entirely in English, and hostility from immigration judges and government attorneys, and anyone would find it difficult to speak in excruciating detail about traumas they would rather put behind them.

Incorrect interpreters lead to the miscommunication of material facts, and adverse credibility findings.

Many judges—both decades ago and today—fail to understand that there are multiple dialects of "Fulani," and that the version spoken in Mauritania and Senegal is different from the dialect spoken in Guinea and other countries. In a situation where details matter, failing to provide the correct interpreter can be fatal to a case, and a person. Interpreters speaking Fulani from Guinea and Sierra Leone are often used to help people from Mauritania communicate in immigration court, with disastrous results.

This is a common problem, according to a report from the *Columbus Dispatch*. It affects people from a variety of ethnic backgrounds, including Indigenous Guatemalans and other speakers of less-common languages.

In 2007, an immigration judge deemed A.T. "not credible" due to a series of communication problems caused by having incorrect interpreters. A.T., a Black Mauritanian man, was furnished interpreters speaking the Guinean dialect of Fulani. He struggled to communicate with and through these interpreters. In an important hearing, he tried to answer questions for himself in English, hoping that his story would be heard more accurately that way than through his Guinean Fulani interpreter.

A.T. did not raise the interpretation problem in court because his core values do not allow him to complain or embarrass someone, such as the interpreter, in public. But Immigration Judge Noel Anne Ferris berated A.T. and accused him of playing games, by requesting an interpreter and failing to use the interpreter. She claimed it was a deliberate stalling tactic.

From the transcript of A.T.'s responses in English, it's clear that his fluency was rudimentary at the time. For example, the judge asked who he lived with and A.T. responded, "I live with my people." Rather than requesting specific details to understand what he was struggling to communicate, in a professional manner, Judge Ferris lashed out. She humiliated A.T. in court, saying that his response was "the way teenagers talk, not grownups who want to communicate effectively." She then found him "not credible" and denied him asylum. He was deported in shackles as part of the Trump mass deportations in 2018.

Judges often fail to understand statelessness and its impacts.

In 2019, A.W.'s Petition for Review was denied by a panel at the 6th Circuit Court of Appeals. He had been rendered stateless by the Mauritanian government in the 2011 census, yet the panel mistakenly argued that "there was no evidence that the census overtly or directly stripped black Mauritanians of their citizenship." The evidence was right in front of them—in the form of a copy of A.W.'s *laissez-passer* (travel document) issued by the Islamic Republic of Mauritania. The document stated that A.W. was a "National" of Mauritania, rather than a "Citizen." As a National, he was not entitled to

a passport or any other Mauritanian identity document. He would not have freedom of movement or work in the country, and was not eligible to vote there.

Those rights are reserved for citizens, which A.W. was no longer. The *laissez-passer* would expire as soon as he touched Mauritanian soil, leaving him without any form of ID. Yet, multiple courts refused to parse the vast difference between "National" and "Citizen," and understand the implications for Black Mauritanians being sent back to a country that no longer recognizes them.

O.T. is another man whose Petition for Review was denied by the 6th Circuit because the judges failed to understand the evidence of statelessness he provided—including a letter from the Embassy of Mauritania that said it could not "deliver any official document" to O.T.

Cases are also decided based on bias and bad "facts."

Several Black Mauritanians' cases have been denied by judges who barely bothered to hide their biases, or understand the evidence before them. As explained earlier, Judges often refuse to believe the impact of statelessness on Black Mauritanians who were out of the country during the 2011 census. Some even ordered Mauritanians deported to other countries, such as Senegal, which illustrates the lack of care taken in their cases.

To this day, the U.S. government continues to cite a 1996 letter from the UNHCR as evidence against claims of ongoing persecution against Black Mauritanians. In this letter, the UNHCR refers to the Mauritanian genocide as a response to an "unsuccessful coup d'etat," which is the framing the White Moors used to justify mass torture, murder, and other human rights atrocities against Black Mauritanians. While the UNHCR letter admits "some [Black people] were killed, many arrested, and others targeted for unprecedented repressive actions"—apparently a polite way to refer to torture—the 1996 letter claims that the situation has been repaired.

The reality is, that the White Moors carried out a genocide. Human Rights Watch far more accurately described the events as a "massacre" in a 1994 report. Black military leaders and soldiers were rounded up and detained on military bases where they were tortured incessantly, and many killed. White Moors hung twenty-eight Black soldiers at the Inal torture camp on November 28, 1990, to commemorate the country's Independence Day. While most witnesses were killed, some survived to tell the story and their widows and orphans continue to seek accountability.

Separate from the military camp atrocities, thousands of other Black Mauritanians were tortured, robbed of their homes and land, and either deported to Senegal or killed. Despite the UNHCR's assurances that Black Mauritanians forcibly deported to Senegal were allowed to return to their homes, land, and lives as they left them, the actual lived experience of Black Mauritanians proves the lie.

Several relatives of A.T. were murdered at the Inal torture camp during the genocide. But his Immigration Judge, Noel Anne Ferris, has a documented history of injecting her own biases into decisions in immigration court. The same year Ferris attacked A.T. for attempting to communicate the best he could, the 2nd Circuit Court of Appeals removed her from another case. The court cited her "speculative and conjectural" comments about an asylum applicant's demeanor, truthfulness, and likelihood of facing persecution if returned to China, his native country, stating that her reasoning was "not supported by substantial evidence."

As she did to A.T., Ferris berated this man for his "behavior" in court. In this case, the asylum applicant had cried about being separated from his daughter, and his wife's forced abortion due to China's "one-child policy." The judge told him to leave the courtroom. Like A.T., Judge Ferris scolded the man from China for occasionally responding to questions with the words "sorry," "OK," and "yeah," in English, instead of through the Chinese interpreter.

The 2nd Circuit Court of Appeals took an important, and uncommon, step when it reviewed the case of Aboubacar Ba, a Black Mauritanian man denied asylum by Immigration Judge Jeffrey Chase. The court found that Chase's decision contained a "plethora of errors and omissions" and the judge demonstrated bias, inappropriate questioning, and hostility toward Mr. Ba.

This was not the first time the 2nd Circuit had critiqued Judge Chase's behavior. In fact, it was at least the eighth time. Not only did the court remove Judge Chase from any further proceedings involving Mr. Ba, but it took the unusual step of suggesting that the Board of Immigration Appeals re-examine all of Judge Chase's cases pending in their jurisdiction.

Of course, the Board of Immigration Appeals had already rubber-stamped Judge Chase's decision when it received the initial appeal. This shows that the BIA is not a true appellate court engaged in meaningful reviews.

A.W.'s 6th Circuit panel invoked a racist trope about sexually prolific Black men when arguing additional reasons to deny his Petition for Review. The panel wrote, "Great deference must be given to the BIA's denials of motions to reopen because 'granting such motions too freely will permit endless delay of deportation by aliens creative and fertile enough to continuously produce new and material facts sufficient to establish a prima facie case.'" (Citing *Bi Feng Liu v. Holder*, 560 F.3d 485, 490 (6th Cir. 2009), quoting *INS v. Abudu*, 485 U.S. 94, 108 (1988).)

Fraudulent or inexperienced attorneys tanked cases. The lack of a guaranteed right to counsel has harmed refugees, as well.

Several Black Mauritanian people who arrived in the late 1990s and early 2000s retained attorney Ronald S. Salomon in New York, and were subsequently ordered deported based on his unprofessional, incomplete, fraudulent, and even non-existent representation. The Ohio Immigrant Alliance is in touch with at least three people harmed by Salomon, and can gather information from others. While the attorney was disciplined for his misconduct, his client-victims have not received justice.

G.N. was not a victim of Salomon, but he still was failed by his immigration attorney. His initial asylum case was denied in 2007 based on a finding of "adverse credibility," because the judge said he did not give specific, detailed accountings of each of his multiple torture experiences, and felt that GN's witness' testimony was exaggerated. Still, G.N. was not deported, and was allowed to live in the U.S. under an Order of Supervision for more than ten years.

When the Trump administration began deporting long-term U.S. residents, Ndiaye was detained. A new lawyer filed a Motion to Reopen his 2007 removal order, but did not interview him to get information about his case and did not file a new asylum application along with the Motion to Reopen. The MTR was denied by the Board of Immigration Appeals in part because it lacked a new application for asylum. G.N. attempted to speak to his lawyer several times while he was detained, and asked her to file a new asylum application with the appeal. The lawyer repeatedly ignored his outreach and told his family to stop calling her. She insisted that the law does not require a new asylum application to be filed along with a Motion to Reopen.

When G.N.'s lawyer filed her appeal with the 6th Circuit, she uploaded a blank document. The error was communicated and she did file a Petition for Review, but it did not include a new asylum application—despite GN's request. The lawyer also failed to file a judicial stay of deportation.

G.N. was deported to Mauritania with his hip completely unattached from his body, due to gross medical neglect while in detention. He is now forced to live apart from his family, including a young child with Down Syndrome.

Five years ago, noncitizens had found attorneys in 65 percent of all pending cases in the Court's backlog. Today, this proportion has dropped to just 30 percent.

Overall, Mauritanians (and others) are far more likely to win their cases in immigration court if they have lawyers. Of the 2,678 Mauritanians who won their cases as of this writing, 92% (2,477) were represented by legal counsel and only 8% (211) were not. Representation matters. Clearly, judges are ordering the deportation of people who would qualify for asylum if they only had a legal guide.

It seems like many immigration judges look for any reason to deny an asylum case, rather than prioritizing the goal of protecting people from persecution. This situation will only get worse with the Biden administration's asylum ban.

In 1999, an immigration judge agreed that A.D. had suffered persecution in Mauritania. However, the judge denied him asylum because A.D.'s persecution was *not severe enough*. He had been violently arrested along with several other people during the genocide in 1989, taken to a jail in Kaedi, and tortured for months. The judge wrote that A.D.'s experience:

> Did not compare to the level of atrocious persecution suffered by the asylum applicant in Matter of Chen, 20 l&N Dec. 16 (BIA 1989). See 8 C.F.R. § 208.13(b)(l)(ii) (establishing that if an alien is not in danger of being persecuted if he is deported, he will not be granted asylum unless the persecution from which he fled was especially heinous). We particularly note that the asylum applicant in Matter of Chen became physically debilitated due to years of mistreatment, had to wear a hearing aid for the rest of his life, and suffered psychological damage that made him suicidal. While we do not doubt that the respondent here suffered greatly as a result of the mistreatment he endured, there was nothing in his testimony to indicate that he suffered from permanent physical or psychological damage. Consequently, *we conclude that the respondent's persecution in Mauritania, while deplorable, was simply not severe enough to warrant asylum.*

With implementation of the Biden administration's asylum ban, judges are even more likely to deem someone ineligible at the outset.

Congress has encouraged the denial of meritorious asylum claims by enacting confusing and complicated landmines, such as provisions in the USA PATRIOT Act (2001) and REAL ID Act (2005). The Biden administration upped the ante with its so-called "transit" ban.

Congressional actions reduced access to asylum in at least two important ways. One, drafters of the PATRIOT Act and REAL ID Act broadened the definition of what constitutes a "terrorist organization" for purposes of immigration exclusion, to "any group of two or more individuals, whether organized or not, which engages in, or has a subgroup which engages in terrorist activity." Prior to this law, terrorist organizations were designated by the Secretary of State; now, any Immigration Judge is empowered to decide whether a grouping of two or more people constitutes a "terrorist organization."

Members of "terrorist organizations" are barred from receiving asylum in the U.S. The post-9/11 laws also made "material support" to such an "organization" a bar to

immigration status, including asylum. But the definition of "material support" fails to distinguish between coerced and voluntary engagement.

For example, a man from Burundi was accused of providing "material support" to a terrorist group because armed rebels stole his lunch and four dollars. A child from the Democratic Republic of the Congo was labeled a "terrorist" by the U.S. government because she was kidnapped and forced to participate in armed conflict. She escaped and spoke out publicly against the coercion of child soldiers. But the U.S. government still considered her to have provided "material support" to an armed group and, therefore, to be ineligible for asylum.

Victims of terrorism are denied asylum in the U.S. because of their very experience as victims of terrorism. This dystopian reality has harmed many true refugees and led to their forced return to the people who harmed them.

Another aspect of the REAL ID Act that made it easier for Immigration Judges to deny asylum centers on the "credibility standard." As Lynn Tramonte and Suma Setty outline in *Broken Hope: Deportation and the Road Home*, REAL ID "gave Immigration Judges unfettered latitude to decide a person seeking asylum is not 'credible' and deny their case. It codified subjective standards, such as judges' reading of the individuals' 'demeanor, candor, and responsiveness.'"

Writing in the Berkeley Journal of Gender, Law & Justice, Melanie A. Conroy explains that these "overly subjective components of the credibility determination invite bias," by allowing judges to deny cases when asylum applicants' demeanor does not "fit within normative male, heterosexual, American cultural expectations for testimonial behavior."

The REAL ID Act has been explicitly cited by judges denying asylum to Black Mauritanians. The Biden administration's asylum ban, while not embedded in law and open to reversal by the Executive Branch, will compound these injustices if it stands.

What To Do Instead

When people decide to leave the place where they were born and raised, there's always a reason. For those fleeing harm, the decision may not be easy or convenient, and they may have no way of obtaining permission to enter a new country before they must leave. That is why the United States has an asylum process that allows people to apply for protection both inside the country and at ports of entry.

In this report, we write about people who attempted to seek asylum in the U.S. and believed the United States would be a beacon of hope, only to be shown the deportation door.

UndocuBlack Network, Mauritanian Network for Human Rights in the U.S., and 102 other immigration, human rights, civil rights, and faith-based organizations sent a letter to President Biden and DHS Secretary Alejandro Mayorkas outlining changes to help Black Mauritanians in the U.S., as well as those who were deported. They are asking the Biden administration to immediately end all deportation flights to Mauritania; grant humanitarian parole to Mauritanians detained in U.S. immigration jails; allow Mauritanians who were deported to return to the U.S; and designate Temporary Protected Status (TPS) for Mauritania. All people deported to dangerous conditions should have a path to safety.

These proposals deal with consequences of an asylum system that is failing Black Mauritanans and others. However, the administration and Congress must also enact paradigm-shifting reforms. The Asylum Seeker Advocacy Project crowdsourced priorities from over 79,000 individuals seeking asylum. Among their recommendations are an easier to follow, more transparent process that treats migrants like the human beings they are.

Said one ASAP member, "We should all have the opportunity to ask for asylum without so many requirements. When they ask for proof of what happened: we do not have time to take a photo or video of the attack, and we cannot file a complaint in our countries of origin because they do not do anything and we are afraid."

Another observed, "For asylum seekers, it's like we do not have a voice. We should make ourselves heard by government officials, and make them understand that we matter too, and we are human too. We help to build our communities, and we would like to be counted too."

In "A New Paradigm for Human and Effective Enforcement," legal expert Peter L. Markowitz, proposes making the U.S. immigration courts politically independent, with decisions subject to true judicial review. Government-funded counsel for immigrants, he writes, is also crucial to ensuring fairer treatment. After all, the Department of Homeland Security is represented in every immigration court case, every time.

Markowitz takes lessons from other areas of administrative law to suggest reorienting immigration laws — and their administration — toward achieving compliance, instead of the punishment framework used today. This, he argues, would create a more just system for immigrants and the government alike. "Doing so will require, first and foremost, a legal scheme that allows for realistic, sensible pathways to comport one's conduct with the law," Markowitz writes.

While that ultimately requires an act of Congress, there are steps the Biden administration can take, on its own, to enhance justice, including several outlined in Markowitz' report. Sending people back to harm is not one of them.

Additional Reading

This is the fourth installment in a series by the Ohio Immigrant Alliance entitled, “Behind Closed Doors: Black Migrants and the Hidden Injustices of US Immigration Courts.” Find this and prior publications at illusionofjustice.org.

“Dystopia, Then Deportation” summarizes insights and recommendations from a strategy session co-hosted by OHIA, the Mauritanian Network for Human Rights in US, and Cameroon Advocacy Network at the Ford Foundation Center for Social Justice.

“Diaspora Dynamics” is an annotated bibliography of over eighty studies into the lives of Black migrants in the U.S., published between 1925 and 2023.

“The System Works As Designed: Immigration Law, Courts, and Consequences” illuminates how the quasi-judicial structure of U.S. immigration courts, and the laws they implement, were built on a foundation of white supremacy, power imbalance, and coercive control.

“Dystopia” and “Diaspora Dynamics” were authored by Nana Afua Y. Brantuo, Ph.D, Founder and Principal of Diaspora Praxis LLC. “The System Works As Designed” was written by Lynn Tramonte, Lauren Hamlett, and Isabel Coyle with editorial review from Breanne Palmer, Esq., Joanne Lin, Esq., Dr. Miranda Cady Hallett, and Dr. Afua Y. Brantuo.

For further discussion about racism in immigration law, policy, and structures, as well as firsthand accounts, read or listen to **“Broken Hope: Deportation and the Road Home”** by Lynn Tramonte and Suma Setty, with research by Maryam Sy.


BURN MARKS DOT HIS ABDOMEN
"Help me get out of this most dangerous country"
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"granting such motions too freely will permit endless delay of deportation by aliens **creative** and **fertile** enough to continuously produce new and material facts"
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