

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 25-cv-1002-RMR

DAYANA MUNOZ RAMIREZ, also known as Alfredo Munoz Ramirez,

Petitioner,

v.

PAMELA BONDI, in her official capacity as Attorney General of the United States,
ROBERT GUADIAN, in his official capacity as Field Office Director, Denver, U.S.
Immigration and Customs Enforcement,
KRISTI NOEM, in her official capacity as Secretary, U.S. Department of Homeland
Security,
TODD LYONS, in his official capacity as Acting Director of Immigration and Customs
Enforcement, and
MARK BOWEN, in his official capacity as Warden of the Aurora Contract Detention
Facility,¹

Respondents.

JOINT MOTION FOR ENTRY OF JUDGMENT

Pursuant to Federal Rule of Civil Procedure 58(d), Petitioner and Respondents
(collectively, the "Parties") jointly move for entry of judgment.

On May 5, 2025, the Court granted in part and denied in part Petitioner's Petition
for Writ of Habeas Corpus. See ECF No. 14. The Court ordered that Respondents
provide Petitioner with a bond hearing, which has since occurred. See *id.* at 19; see
also ECF No. 15. The Court, however, has not yet entered judgment in this habeas
proceeding. See ECF No. 14.

¹ Pursuant to Federal Rule of Civil Procedure 25(d), Mark Bowen, the Acting Warden of
the Aurora Contract Detention Facility, is automatically substituted as an official-
capacity respondent in this matter.

Federal Rule of Civil Procedure 58(d) provides that “[a] party may request that judgment be set out in a separate document as required by Rule 58(a).” Fed. R. Civ. P. 58(d). Federal Rule of Civil Procedure 58(a) states that a judgment “must be set out in a separate document,” except for in limited circumstances that are inapplicable here. Fed. R. Civ. P. 58(a).

Therefore, pursuant to Federal Rule of Civil Procedure 58(d), the Parties respectfully request that the Court enter judgment in this habeas proceeding.

A proposed Final Judgment has been attached to this Motion and will be contemporaneously submitted to the Court’s Chambers under RMR Civ. Practice Standard 7.1A(a)(1).

Dated: June 26, 2025.

Respectfully submitted,

s/ Colleen Mary Cowgill
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CERTIFICATE OF SERVICE

I hereby certify that, on June 26, 2025, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following individuals:

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Attorney for Petitioner

s/ Nicholas A. Deuschle _____

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United States Attorney's Office