

**UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT**

RUMEYSA OZTURK,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PATRICIA HYDE, in her official capacity as the New England Field Office Director for U.S. Immigration and Customs Enforcement; MICHAEL KROL, in his official capacity as HSI New England Special Agent in Charge, U.S. Immigration and Customs Enforcement; TODD LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State,

Respondents.

Case No. 2:25-cv-00374

**MOTION FOR RELEASE UNDER *MAPP* v. *RENO*, OR IN THE ALTERNATIVE, FOR  
RETURN TO VERMONT**

Petitioner Rumeysa Öztürk, through counsel, moves this Court for an order of immediate release pending the adjudication of her habeas petition under the Court's inherent authority to grant release on bail to a habeas petitioner who warrants immediate relief and release. In the alternative, Ms. Öztürk respectfully requests that the Court order her to be transferred back to this District for the pendency of this litigation. In support of this motion, Petitioner submits the accompanying memorandum of law and associated exhibits.

**REQUEST FOR ORAL ARGUMENT**

Ms. Öztürk believes oral argument may assist the Court in resolving this motion and respectfully requests oral argument.

Respectfully submitted,

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Dated: April 10, 2025

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*\*Pro hac vice application forthcoming*

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7(a)(7)

I hereby certify that on April 10, 2025, Petitioner's counsel conferred with Respondents' counsel in accordance with Local Rule 7(a)(7). Respondents' counsel indicated that Respondents oppose the motion.

April 10, 2025

/s/ Lia Ernst  
Lia Ernst