



yet remains detained after a second remand by the Board of Immigration Appeals (“BIA”). His upcoming individual hearing is not until August 12, 2025, at which point he will have spent over two years in detention.

Petitioner hereby opposes the government’s Motion to Dismiss. For the reasons set forth the attached Memorandum in Support of his Opposition to the Government’s Motion to Dismiss, Petitioner respectfully requests that the Court deny the government’s Motion to Dismiss and grant Petitioner’s Petition for Writ of *Habeas Corpus*, ordering that Petitioner receive a new bond redetermination hearing based upon his materially changed circumstances.

Respectfully submitted this 13<sup>th</sup> day of June 2025,

/s/ Ronald Abramson

Ronald L. Abramson, Esq. (NH Bar# 9936)  
Shaheen & Gordon, P.A.  
1155 Elm Street Suite 300, Manchester, NH 03101  
[rabramson@shaheengordon.com](mailto:rabramson@shaheengordon.com)  
Ph: 603-792-8472, Fax: 603-669-0903

/s/ Mary Holper

Mary Holper, Esq.\*  
Natalie Reysa, Student Attorney\*  
Staniel Brutis, Student Attorney\*  
Boston College Legal Services LAB Immigration Clinic  
885 Centre St., Newton MA 02459  
[holper@bc.edu](mailto:holper@bc.edu), Ph: 617-552-4573, Fax: 617-552-0593

\*Attorney Holper, *pro hac vice admission* under D.N.H. Local Rule 83.2(b).

\*Student Attorneys Reysa and Brutis, *student appearances* under D.N.H Local Rule 83.2(c), Appearance in Court by Law Students and Graduates.