IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Anner Ariel Cordon Salguero,

Petitioner,

v.

Noem, et al.,

Respondents.

Civil Case No. 1:25-cv-1626-GLR

RESPONDENT'S RESPONSE IN OPPOSITION TO PETITIONER'S APPLICATION FOR WRIT OF HABEAS CORPUS, MOTION TO DISMISS OR ALTERNATIVELY TO STAY PROCEEDINGS

Respondents, through undersigned counsel Thomas Corcoran, Assistant United States Attorney for the District of Maryland, oppose Petitioner's Application Writ of Habeas Corpus and request that it be denied. Further, the Respondents move to dismiss, or in the alternative to stay, the Petition on the grounds that the Petitioner is a class member in a nationwide class certified in *D.V.D. v U.S. Department of Homeland Security*, ECF 118, 64 and 6-1 Civ. 25-10676-BEM (D. Mass. April 18 and May 21, 2025) ("*D.V.D.* Memorandum and Order") and the procedures governing third country removals, such as the instant case, have already been ordered.

WHEREFORE, the Respondents respectfully request this Court enter an Order DENYING Petitioner's Application for Writ of Habeas Corpus, and an Order DISMISSING or alternatively STAYING Petitioner's Application for Writ of Habeas Corpus.

Dated June 4, 2025

Respectfully Submitted,

Kelly O. Hayes United States Attorney

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