

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT COURT OF MINNESOTA  
Civil No. 25-cv-02532-LMP-ECW

ABDIRASHID MOHAMED AHMED

  
Petitioner,

v.

**James Mchenry and Lisa Monaco,**  
US ATTORNEY GENERAL;  
**Kristi Noem,**  
SECRETARY OF DEPARTMENT OF  
HOMELAND SECURITY;  
**Peter Berg,**  
FIELD OFFICE DIRECTOR FOR THE  
MINNEAPOLIS FIELD OFFICE  
**Warden** of Freeborn County Detention Center,

Respondents,

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CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA



**RESPONSE IN OPPOSITION TO RESPONDENT MOTION TO DISMISS**

Petitioner moves to respond to respondent's arguments. Petitioner re-alleges and incorporates by reference the petition for writ of habeas corpus (EFC No. 1). Petitioner asserts that respondent's legal argument in regards to change of circumstances is contradictory since respondent is well aware of the somalian consulate response denying petitioner's request for travel document. Also, petitioner alleges that he has demonstrated that there is not significant likelihood of his removal in the reasonably foreseeable future. For the reasons in the attached brief in support, Petitioner request

REC'D / U.S. ATTORNEY'S  
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that the court grant the petition for habeas corpus, preliminary injunction and temporary restraining order.

Respectfully submitted,

ABDIRASHID MOHAMED AHMED

  
Freeborn County Detention Center  
PO Drawer 170  
Albert Lea, MN 56007

Date: July 14, 2025