

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GUSTAVO BASURTO OJEDA,

Petitioner,

v.

NIKITA BAKER, Director, Baltimore
Field Office, U.S. Immigration and Customs
Enforcement,

Respondent.

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Case No.: 1-25-cv-01862-MJM

**RESPONSE TO PETITIONER'S VERIFIED PETITION FOR WRIT OF HABEAS CORPUS
AND EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER, MOTION TO
DISMISS OR STAY**

Nikita Baker, Director, Baltimore Field Office, U.S. Immigration and Customs Enforcement ("Respondent"), by and through counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, Thomas F. Corcoran and Beatrice C. Thomas, Assistant United States Attorney for that district, hereby responds to Gustavo Basurto Ojeda's ("Petitioner") Petition and emergency motion for temporary restraining order, and moves to dismiss, or in the alternative to stay, the Petition. The Agency's arguments in support of this motion are fully set forth in the attached Memorandum of Law.

Respectfully submitted,

KELLY O. HAYES
United States Attorney

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of June, 2025, I caused a copy of the foregoing *Motion* to be filed with the Clerk of the Court via the CM/ECF System and emailed to Plaintiff's Counsel.

/s/

Beatrice C. Thomas
Assistant United States Attorney

TABLE OF CONTENTS

I.	INTRODUCTION	2
II.	FACTUAL BACKGROUND	2
	A. Petitioner is subject to a final order of removal	2
	B. There is currently a certified nationwide non-opt out class action pending in the District of Massachusetts that includes Petitioner.	5
III.	LEGAL STANDARDS	6
IV.	ARGUMENT	7
	A. Because Petitioner is a member of an already-certified non-opt out class action, dismissal or stay is appropriate.....	7
	B. Alternatively, this Court should stay proceedings pending the resolution of <i>D.V.D.</i>	9
	C. Petitioner’s claims fail on the merits because ICE is authorized to detain and deport him.	11
	1. <i>ICE lawfully detained Petitioner pursuant to 8 U.S.C. § 1231(a).</i>	11
	2. <i>Petitioner’s claim is premature as he has only been detained for almost two days</i>	12
	D. This Court lacks jurisdiction to stay ICE’s execution of lawful removal orders..	14
	E. Petitioner cannot stay detained in the State of Maryland.....	16
V.	CONCLUSION	17