

**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

**RESPONDENT’S SUPPLEMENTAL DECLARATION IN SUPPORT OF THE
MOTION TO DISMISS THE HABEAS PETITION**

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 Attorneys for that district, hereby submits supplemental declaration, **Exhibit 1**, Declaration of Gerald Edwards, Assistant Field Office Director, Immigration and Customs Enforcement, in accordance with the Court’s request during the August 1, 2025 Motions Hearing, addressing the Respondent’s efforts in effectuating the removal of Gustavo Basurto Ojeda (“Petitioner”).

SIGNATURE BLOCK TO FOLLOW

Dated August 8, 2025

Respectfully Submitted,

Kelly O. Hayes
United States Attorney

By: /s/ Beatrice C. Thomas
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Beatrice C. Thomas (Bar No. 21969)
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Counsel for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of August, 2025, I caused a copy of the foregoing *Supplemental Declaration* 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