

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

ISRAEL ADONAY SAGASTIZADO
SANCHEZ,

Petitioner,

V.

KRISTI NOEM, Secretary of Homeland Security, ET AL.,

Respondents.

மாண்புமிகு பேரவைத் தலைவர்:

CIVIL ACTION NO. 5:25-CV-104

**RESPONDENTS' RESPONSE IN NON-OPPOSITION TO PETITIONER'S
MOTION FOR LEAVE TO SERVE DOCUMENT REQUEST**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW the Respondents, Kristi Noem, Secretary of the U.S. Department of Homeland Security, Todd Lyons, Acting Director of U.S. Immigration and Customs Enforcement (ICE), Daniel Bible, San Antonio Field Office Director for ICE, Pamela Bondi, Attorney General of the United States, and the unnamed Warden of the Webb County Detention Center, in their official capacities, by and through the United States Attorney for the Southern District of Texas, and hereby file their Response in Non-Opposition to Petitioner's Motion for Leave to Serve Document Request:

1.) On June 25, 2025, Petitioner Israel Adonay Sagastizado (Sagastizado) filed his Petition for Writ of Habeas Corpus in this Court seeking his release from ICE custody at the Webb County Detention Center in Laredo, Texas, where he was detained pending removal from the United States. On August 8, 2025, Respondents filed their Motion to Dismiss Petitioner's Petition for Writ of Habeas Corpus.

2.) On August 16, 2025, Sagastizado filed his Motion for Leave to Serve Document Request (motion for leave), requesting leave to serve one single document request on Respondents, requesting "All Communications to or from any Third-Country Government, regarding accepting Petitioner for removal; including but not limited to any formal or informal request for travel documents from the Third-Country Government, and any formal or informal response thereto."

3.) Respondents do not oppose the granting of the motion for leave as to the single document request set out therein.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

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FOR RESPONDENTS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **RESPONDENTS' RESPONSE IN NON-OPPOSITION TO PETITIONER'S MOTION FOR LEAVE TO SERVE DOCUMENT REQUEST** in the case of **ISRAEL ADONAY SAGASTIZADO SANCHEZ v. KRISI NOEM. ET AL**, Civil Action Number 5:25-CV-104, was sent to Simon Y. Sandoval-Moshenberg, Murray Osorio PLLC, 4103 Chain Bridge Road, Suite 300, Fairfax, Virginia 22030, by electronic mail through the District Clerk's electronic case filing system, on this the 27th day of August, 2025.

"S/" Hector C. Ramirez
HECTOR C. RAMIREZ
Assistant United States Attorney