

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

OSCAR BONILLA MARTINEZ,

Petitioner,

v.

NIKITA BAKER, *et al.*,

Respondents.

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No. 1:25-cv-2027-BAH

**RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS AND
MOTION TO DISMISS OR STAY**

Kristi Noem, Secretary of the U.S. Department of Homeland Security and Nikita Baker, Director, Baltimore Field Office, U.S. Immigration and Customs Enforcement ("Respondents"), by and through counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, Thomas F. Corcoran and Charles R. Gayle, Assistant United States Attorneys for that district, hereby respond to Oscar Bonilla Martinez's ("Petitioner") Petition, and move 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

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th day of July, 2025, I caused a copy of the foregoing *Response to the Petition for Writ of Habeas Corpus* to be filed with the Clerk of the Court via the CM/ECF System.

/s/ Charles R. Gayle
Charles R. Gayle
Assistant United States Attorney