

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

MANUEL ANTONIO CASTRO ZUMBA,

Petitioner,

v.

Civil Action No. 1:25-cv-00243-SE-AJ

E.L. TATUM, JR., Warden of the Federal
Correctional Institute, Berlin;
PATRICIA H. HYDE, Acting Field Office
Director of the Immigration and Customs
Enforcement, Enforcement and Removal
Operations, Boston Field Office,

Respondents.

**FEDERAL RESPONDENTS' MOTION TO DISMISS
OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT**

Federal Respondents move the Honorable Court to dismiss this action pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6). In the alternative, Federal Respondents ask this Court to grant summary judgment pursuant to Fed. R. Civ. P. 56, as the undisputed material facts entitles Federal Respondents to judgment as a matter of law. In support of this motion, Federal Respondents refer the Court to the memorandum filed in support of the motion, the exhibit, and the record of this litigation.

Respectfully submitted,

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