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UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT COURT OF MINNESOTA  
Civil No. 25-cv-02746-PJS-DTS

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CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

ROMAN SERGEEVICH GOLOVANOV

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**Petitioner,**

V.

**James Mchenry and Lisa Monaco,**  
US ATTORNEY GENERAL;  
**Kristi Noem,**  
SECRETARY OF DEPARTMENT OF  
HOMELAND SECURITY;  
**Peter Berg,**  
FIELD OFFICE DIRECTOR FOR THE  
MINNEAPOLIS FIELD OFFICE  
**Warden** of Freeborn County Detention Center,

**Respondents,**

**RESPONSE IN OPPOSITION TO RESPONDENT MOTION TO DISMISS**

Petitioner moves to respond to respondent's arguments. Petitioner re-alleges and incorporates by reference the petition for writ of habeas corpus (EFC No. 1). Respondent agrees that petitioner detention exceeds the presumptively reasonable six-month period under Zadvydas. (Doc 4 page 7). Petitioner alleges detention beyond this period is "prolonged" and "requires that adequate procedural safeguards be in place to protect against the erroneous deprivation of liberty". Also, petitioner argues that he has met his initial burden of proving that there is not significant likelihood of his removal in the reasonably foreseeable future. For the reasons in the attached brief in support, Petitioner should be granted immediate released or in alternative, a bond hearing where the

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government carry the burden of proving by clear and convincing evidence that petitioner is a danger to the community or a flight risk.

Respectfully submitted,

ROMAN SERGEEVICH GOLOVANOV

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Freeborn County Detention Center

PO Drawer 170

Albert Lea, MN 56007

Date: July 30, 2025