

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

TOUNI GHAMELIAN,

Petitioner,

v.

NIKITA BAKER, et al.,

Respondents.

Civil Case No. 1:25-cv-2106-SAG

**RESPONDENT'S OPPOSITION TO PETITIONER'S WRIT OF HABEAS CORPUS
AND MOTION TO DISMISS**

Respondents, through undersigned counsel Thomas Corcoran and Michael Wilson, Assistant United States Attorneys for the District of Maryland, respond to Petitioner's Writ of Habeas Corpus and request that it be denied. Further, the Respondents move under Federal Rule of Civil Procedure 12(b)(1) to dismiss the Petition. The two independent bases to deny, and ultimately dismiss, this Petition jurisdictionally include (1) 8 U.S.C. §1252(b)(9), which limits judicial review of questions of law and fact arising from review of judicial orders of removal to the appropriate court of appeals, not district courts, and (2) 8 U.S.C. §1252(g), which bars district court review of any "decision or action by [ICE] to . . . execute removal orders." *Mapoy v. Carroll*, 185 F.3d 224, 230 (4th Cir. 1999). Finally, Petitioner's detention complies with the Immigration and Nationality Act ("INA"), its implementing regulations, and the Constitution, warranting denial of the Petition. 8 U.S.C. § 1231(a).

This Opposition and Motion is supported by the attached accompanying Memorandum of Law which is incorporated herein.

Dated July 9, 2025

Respectfully Submitted,

Kelly O. Hayes
United States Attorney

By: /s/ Thomas F. Corcoran
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of July, 2025, I filed and served the foregoing, a supporting memorandum of law and all exhibits thereto, and a proposed order via CM/ECF.

/s/
Michael J. Wilson