

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

MAZIAR MOSBERIAN TANHA,

Petitioner,

v.

WARDEN, *et al.*,

Respondents.

Civ. A. No. 1:25-cv-2121-JRR

**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; Nikita Baker, Director, Baltimore Field Office, U.S. Immigration and Customs Enforcement; Pam Bondi, Attorney General of the United States; Todd M. Lyons, U.S. Immigration and Customs Enforcement; and the Warden of the Baltimore Detention Facility (“Respondents”), by and through counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, and Thomas F. Corcoran and Michael J. Wilson, Assistant United States Attorneys for that district, hereby respond to Maziar Mosberian Tanha’s (“Petitioner”) Petition, and move to dismiss, or in the alternative to stay, the Petition. Respondents’ arguments in support of this motion are fully set forth in the attached Memorandum of Law.

A proposed Order is attached.

Respectfully submitted,

KELLY O. HAYES
United States Attorney

/s/

Thomas Corcoran (Bar No. 24894)
Michael J. Wilson (Bar No: 18970)
Assistant United States Attorneys
U.S. Attorney's Office
District of Maryland
36 S. Charles Street, 4th Floor
Baltimore, Maryland 21201
(410) 209-4800

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of July, 2025, I filed and served the foregoing
and a proposed order via CM/ECF.

/s/

Michael J. Wilson