

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

RALPH BRONSON FILS-AIME,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 1:25-cv-287-JL-TSM
	)	
<b>WARDEN, FCI-BERLIN; PATRICIA H. HYDE,</b>	)	
ACTING FIELD OFFICER DIRECTOR OF THE U.S.	)	
IMMIGRATION AND CUSTOMS ENFORCEMENT,	)	
ENFORCEMENT AND REMOVAL OPERATIONS	)	
BOSTON FIELD OFFICE; <b>TODD LYONS,</b> ACTING	)	
DIRECTOR, U.S. IMMIGRATION AND CUSTOMS	)	
ENFORCEMENT; <b>KRISTI NOEM,</b> SECRETARY OF	)	
THE DEPARTMENT OF HOMELAND SECURITY;	)	
<b>PAMELA BONDI,</b> U.S. ATTORNEY GENERAL,	)	
	)	
Respondents,	)	
	)	

RESPONDENTS' MOTION TO DISMISS OR FOR SUMMARY JUDGMENT

Respondents Andrew Ackley,<sup>1</sup> Patricia Hyde, Todd Lyons, Kristi Noem, and Pamela Bondi, in their official capacities, by and through their attorney, Erin Creegan, United States Attorney for the District of New Hampshire, respectfully file this Motion to Dismiss or for Summary Judgment in response to Petitioner Ralph Bronson Fils Aime's Petition for Writ of Habeas Corpus and related Addenda. ECF Nos. 1, 5, 6, 8, 12.

In support, Respondents refer the Court to the memorandum filed in support of the motion, the exhibits, and the record of this litigation.

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<sup>1</sup> Andrew Ackley is the current acting Warden of FCI Berlin. *See* Fed. R. Civ. P. 25(d) (“[W]hen a public officer who is a party in an official capacity . . . resigns, or otherwise ceases to hold office while the action is pending[, t]he officer’s successor is automatically substituted as a party.”).

Respectfully submitted,

ERIN CREEGAN  
U.S. Attorney

Dated: September 2, 2025

By: /s/Anna Dronzek  
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