

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Roosevelt B.,

Case No.: 25-CV-03198-PJS-DTS

Petitioner

v.

**PETITIONER'S RESPONSE TO
RESPONDENTS' OBJECTIONS TO
THE MAGISTRATE'S REPORT &
RECOMMENDATION**

Pamela Bondi, Attorney General; Kristi Noem, Secretary of Homeland Security; Todd M. Lyons, Acting Director of U.S. Immigration & Customs Enforcement; Marcos Charles, Acting Executive Associate Director for Enforcement and Removal Operations; Peter Berg, Field Office Director for Enforcement and Removal Operations; U.S. Immigration & Customs Enforcement; U.S. Department of Homeland Security; Joel Brott, Sherburne County Sheriff.

**EXPEDITED HANDLING
REQUESTED**

Respondents.

Petitioner is in receipt of Respondents' objections to the magistrate's Report and Recommendation. *See* ECF Nos. 15, 18. Respondents' arguments are adequately rebutted by Petitioner's submissions in prior submissions that are incorporated by reference. *See* ECF No. 12 at 7-11. Petitioner respectfully submits that the Court must affirm the magistrate's holding to the extent the magistrate correctly determined that Petitioner's custody is currently governed by 8 U.S.C. § 1231.

DATED: October 16, 2025

Respectfully submitted,

RATKOWSKI LAW PLLC

/s/ Nico Ratkowski

Nico Ratkowski (Atty. No.: 0400413)
332 Minnesota Street, Suite W1610
Saint Paul, MN 55101
P: (651) 755-5150
E: nico@ratkowskilaw.com

Attorney for Petitioner