

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

Tajdinali MOMIN

Petitioner,

V.

KRISTI NOEM, Secretary of the United States
Department of Homeland Security; et al.

Respondents.

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CIVIL CASE NO. 5:25-cv-01017

**RESPONSE OF WARDEN CHARLOTTE COLLINS
TO PETITION FOR WRIT OF HABEAS CORPUS**

Pursuant to the Federal Rules of Civil Procedure, Respondent Charlotte Collins, Warden of the T. Don Hutto Detention Center (“Warden Collins” or “Respondent”) timely files this Response to Petitioner’s Petition for Writ of Habeas Corpus [Dkt #1] (“Petition”). Warden Collins sets forth below her specific admissions and denials to the factual allegations in the Petition based on information known to and readily ascertainable by her at the time of filing this pleading.

By way of further response, Warden Collins adopts and incorporates as if set forth fully herein all responsive pleadings and/or motions filed in this cause by or on behalf of Kristi Noem, Todd M. Lyons and/or Miguel Vergara (collectively “Government Defendants”), including all factual allegations, legal arguments and defenses set forth therein.

SPECIFIC ADMISSIONS AND DENIALS

1. With regard to numbered Paragraphs 1-6 of the Petition, Warden Collins admits that Petitioner is in the custody of the United States government at the T. Don Hutto Detention Center in Taylor, Texas, but denies he is entitled to the relief sought. Warden Collins is without

knowledge or information to admit or deny the remaining allegations of fact or law in these paragraphs of the Petition and they are therefore denied.

2. With regard to numbered Paragraphs 7-11 of the Petition, under the heading “Parties,” Warden Collins admits each of the listed parties has been named in this action, and admits she is warden of the T. Don Hutto Residential Facility in Taylor, Texas. Warden Collins is without knowledge or information sufficient to admit or deny the remaining allegations of fact or law in these paragraphs of the Petition and they are therefore denied.

3. With regard to numbered Paragraphs 12-14 of the Petition, under the heading “Jurisdiction,” Warden Collins admits Petitioner is detained within this district, and does not contest the jurisdiction of this court or that venue in this district is proper. Warden Collins is without knowledge or information sufficient to admit or deny the remaining allegations of fact or law in these paragraphs of the Petition and they are therefore denied.

4. With regard to numbered Paragraphs 15-21 of the Petition, under the heading “Statutory and Regulatory Framework Governing Re-Detention,” Warden Collins is without knowledge or information sufficient to admit or deny the allegations of fact or law in these paragraphs of the Petition and they are therefore denied.

5. With regard to numbered Paragraphs 22-39 of the Petition, under the heading “Procedures Governing Deportation to Designated Countries” (with sub-headings A and B), Warden Collins is without knowledge or information sufficient to admit or deny the allegations of fact or law in these paragraphs of the Petition and they are therefore denied.

6. With regard to numbered Paragraphs 40-46 of the Petition, under the heading “Facts,” Warden Collins is without knowledge or information sufficient to admit or deny the allegations of fact or law in these paragraphs of the Petition and they are therefore denied.

7. With regard to numbered Paragraph 47 of the Petition, under the heading “Exhaustion of Administrative Remedies,” Warden Collins is without knowledge or information sufficient to admit or deny the allegations of fact or law in this Paragraph of the Petition and they are therefore denied.

8. With regard to numbered Paragraphs 48-61 of the Petition set forth under the heading “Claims for Relief,” these paragraphs set forth legal claims and claims for relief, rather than factual allegations, such that specific admissions and denials are not required. To the extent specific admissions or denials are required in response to these paragraphs of the Petition, Warden Collins denies the allegations of fact and law in this paragraph, if any, and denies Petitioner is entitled to the relief sought.

9. With regard to the paragraph of the Petition set forth under the heading “Prayer for Relief,” including subparagraphs (a) through (e), this paragraph and subparagraphs set forth legal claims and claims for relief, rather than factual allegations, such that specific admissions and denials are not required. To the extent specific admissions or denials are required in response to this paragraph of the Petition, Warden Collins denies the allegations of fact and law in this paragraph, if any, and denies Petitioner is entitled to the relief sought.

AFFIRMATIVE DEFENSES AND OTHER DEFENSIVE MATTERS

10. As set forth above, by way of further answer to the Petition, Warden Collins adopts and incorporates as if set forth fully herein all responsive pleadings and/or motions filed in this cause by or on behalf of one or more of the Government Defendants, including all factual allegations, legal arguments and defenses set forth therein.

Dated October 24, 2025.

Respectfully submitted,

By: /s/ Danya W. Blair
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**ATTORNEY FOR RESPONDENT
WARDEN CHARLOTTE COLLINS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on all counsel of record by ECF and email on October 24, 2025.

/s/ Danya W. Blair