

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

PAULO CESAR GAMEZ LIRA,

Petitioner,

v.

No. 1:25-cv-00855-WJ-KK

KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security; PAMELA BONDI, in her official capacity as Attorney General of the United States; TODD LYONS, in his official capacity as Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement; MARY DE ANDA-YBARRA, in her official capacity as Field Office Director of the El Paso Field Office of U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations; and DORA CASTRO, in her official capacity as Warden of the Otero County Processing Center,

Respondents.

**RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS (DOC. 1)**

Respondents hereby submit this response to the Petition for Writ of Habeas Corpus (Doc. 1), pursuant to the Court's expedited briefing schedule (Doc. 18), stating the following:

1. Respondents do not oppose the central relief sought by Petitioner, specifically release from custody. *See* Doc. 1 at 20 ¶ E. To the extent Petitioner requests any additional relief, Respondents would oppose.

2. Respondents respectfully contend this position moots any and all remaining matters before the Court in the above-captioned case.

3. This limited statement of non-opposition does not admit the factual allegations

made in the Petition for Writ of Habeas Corpus (Doc. 1) nor does it concede the legal arguments articulated therein.

Respectfully submitted,

*/s/ Ryan Ellison*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 2025, I filed the foregoing pleading electronically through the CM/ECF system which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

*/s/ Ryan Ellison*  
RYAN ELLISON  
Acting United States Attorney