

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HARSH PATEL,)
)
Petitioner,)
) No. 25 C 11180
v.)
) Judge Cummings
KRISTI NOEM, in her official capacity as)
Secretary of Homeland Security, *et al.*,)
)
Respondents.)

RETURN TO PETITION FOR HABEAS CORPUS

Pursuant to 28 U.S.C. § 2243, the government respondents submit this return, together with the accompanying memorandum of law, in response to the petition for a writ of habeas corpus of petitioner Harsh Patel, filed on September 16, 2025. Dkt. 1.

1. The attached documents are taken from Patel's administrative file, as maintained by and provided to this office by U.S. Immigration and Customs Enforcement ("ICE").
2. Exhibit 1 is a copy of the Notice to Appear issued to Patel on September 16, 2025.
3. Exhibit 2 is a copy of the United States Department of Homeland Security's ("DHS") Record of Deportable/Inadmissible Alien for Mr. Patel, dated September 16, 2025.
4. Exhibit 3 is a copy of DHS's warrant for the arrest of Patel, dated September 15, 2025.
5. Exhibit 4 is a copy of the Board of Immigration Appeals' decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).
6. The facts contained in Exhibits 1 through 4, as well as the law set forth in the government's contemporaneously filed memorandum in opposition to Patel's petition, establish that Patel's detention is lawful.

WHEREFORE, based on the foregoing, the government respectfully requests that the court enter judgment denying petitioner's petition.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

By: s/ Joshua S. Press

JOSHUA S. PRESS
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 886-7625
joshua.press@usdoj.gov