

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

JOEL LAZARO LAZARO,

\*

Petitioner,

\*

Case No. 8:25-cv-03162-PX

v.

\*

NIKITA BAKER, *et al.*,

\*

Respondents.

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\* \* \* \* \*

**RESPONSE TO PETITION FOR  
WRIT OF HABEAS CORPUS AND MOTION TO DISMISS**

Respondents, United States Immigration and Customs Enforcement (“ICE”) Baltimore Field Office Director Nikita Baker, ICE Acting Director Todd Lyons, United States Department of Homeland Security Secretary Kristi Noem, and United States Attorney General Pamela Bondi (collectively, “Respondents”), by and through undersigned counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, and Megan L. Micco, Assistant United States Attorney for that District, hereby respond to the Petition for Writ of Habeas Corpus (ECF No. 1) and the Supplement thereto (ECF No. 14) (collectively, the “Petition”) filed by Petitioner Joel Lazaro Lazaro and further move to dismiss the Petition in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(6) for the reasons set forth in the accompanying Memorandum of Law, which is incorporated by reference herein.

WHEREFORE, Respondents respectfully request that the Court deny the Petition and dismiss it in its entirety.

Dated: October 17, 2025

Respectfully submitted,

Kelly O. Hayes  
United States Attorney

By: /s/ Megan L. Micco  
Megan L. Micco (Bar No. 20936)  
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*Counsel for Respondents*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of October, 2025, a copy of the foregoing Response to Petition for Writ of Habeas Corpus and Motion to Dismiss with the accompanying Memorandum of Law in Support thereof and all supporting exhibits was served via CM/ECF on all parties and counsel receiving electronic notice in this case.

/s/ Megan L. Micco  
Megan L. Micco (Bar No. 20936)  
Assistant United States Attorney