

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

MAYNOR ANTONIO RAMIREZ VALVERDE,

Petitioner,

v.

Case No. 25-cv-1502

SAM OLSON, et al.,

Respondents.

**PETITIONER'S BRIEF IN OPPOSITION TO RESPONDENTS' CIVIL L.R. 7(h)
EXPEDITED NON-DISPOSITIVE MOTION FOR EXTENSION OF TIME TO
RESPOND TO HABEAS PETITION**

Petitioner, Maynor Antonio Ramirez Valverde, took the extraordinary action of asking this Court to issue a Writ of Habeas Corpus because Respondents are unlawfully detaining him. Respondents, who have yet to release Petitioner from this unlawful detention, ask this Court for an additional six days to file an answer. Because any such extension prolongs the time in which Mr. Ramirez Valverde is unlawfully detained, Mr. Ramirez Valverde opposes this request.

On September 29, 2025 Mr. Ramirez Valverde filed his verified petition for a Writ of Habeas Corpus, asking this Court to require Respondents to provide him with a bond hearing pursuant to 8 U.S.C. § 1226(a) within 14 days. (Dkt. 1, at 13.) The next day, this Court gave Respondents 14 days to answer the Petition, and set up an expedited briefing schedule following the filing of the answer, giving Petitioner seven days to file a supporting brief after the answer is filed, giving Respondents seven days to respond, and giving Petitioner three days to file a reply brief. Respondents now ask this Court for an additional six days to file an answer to the Petition. (Dkt. 10.)

Mr. Ramirez Valverde respectfully requests this Court to deny Respondents' request because any extension of time extends the time that he is unlawfully detained and thus irreparably harmed. *See United States v. Lapi*, 458 F.3d 555, 561 (7th Cir. 2006) (recognizing that detention is a form of irreparable harm). Before September 5, 2025, Mr. Ramirez Valverde had never been detained in the United States. (Dkt. 1, ¶ 46.) Despite not being charged with any crime, he is now detained in the Dodge County Jail, a facility in which individuals who have been accused of and/or convicted of serious crimes are detained.

Further, in light of the dozens of federal district court cases that have already either rejected or expressed doubt over Respondents' recent position on mandatory detention without bond, Mr. Ramirez-Valverde is likely to succeed on his claim for a bond hearing. *See, e.g., Luna Quispe v. Crawford*, 25-cv-1471, 2025 WL 2783799, at *5 (E.D. Va. Sept. 29, 2025); *Guerrero Orellana v. Moniz*, 25-cv-12664, 2025 WL 2809996, at *6 (D. Mass. Oct. 3, 2025); *Chanaguano Caiza v. Scott*, 25-cv-00500, 2025 WL 2806416, at *3 (D. Me. Oct. 2, 2025); *D.S. v. Bondi*, 25-cv-3682, 2025 WL 2802947, at *6 (D. Minn. Oct. 1, 2025); *Rodriguez Vazquez v. Bostock*, No. 25-cv-05240, 2025 WL 2782499, at *27 (W.D. Wash. Sept. 30, 2025); *J.U. v. Maldonado*, 25-CV-04836, 2025 WL 2772765, at *5 (E.D.N.Y. Sept. 29, 2025); *Rivera Zumba v. Bondi*, No. 25-cv-14626, 2025 WL 2753496, at *7 (D.N.J. Sept. 26, 2025); *Lopez v. Hardin*, No. 25-cv-830, 2025 WL 2732717, at *2 (M.D. Fla. Sept. 25, 2025); *Lepe v. Andrews*, No. 25-cv-01163, 2025 WL 2716910, at *9 (E.D. Cal. Sept. 23, 2025); *Giron Reyes v. Lyons*, No. C25-4048, 2025 WL 2712427, at *5 (N.D. Iowa Sept. 23, 2025); *Singh v. Lewis*, No. 25-cv-96, 2025 WL 2699219, at *3 (W.D. Ky. Sept. 22, 2025); *Pablo Sequen v. Kaiser*, No. 25-cv-06487, 2025 WL 2650637, at *7-8 (N.D. Cal. Sept. 16, 2025); *Jimenez v. FCI Berlin, Warden*, No. 25-cv-326, 2025 WL 2639390, at *10 (D.N.H. Sept. 8, 2025); *Lopez-Campos v. Raycraft*, No. 25-cv-12486, 2025 WL 2496379, at *8 (E.D. Mich. Aug. 29, 2025); *Arrazola-Gonzalez v. Noem*, No. 25-cv-01789, 2025 WL 2379285, at *2 (C.D. Cal. Aug.

15, 2025); *Anicasio v. Kramer*, 25CV3158, 2025 WL 2374224, at *2 (D. Neb. Aug. 14, 2025); *Lopez Benitez v. Francis*, No. Civ. 5937, 2025 WL 2371588, at *3 (S.D.N.Y. Aug. 13, 2025); *Rosado v. Figueroa*, No. CV 25-02157, 2025 WL 2337099, at *10 (D. Ariz. Aug. 11, 2025). *But see Vargas Lopez v. Trump*, 25CV526, 2025 WL 2780351, at *9 (D. Neb. Sept. 30, 2025); *Chavez v. Noem*, 25-cv-02325, 2025 WL 2730228, at *5 (S.D. Cal. Sept. 24, 2025).

Finally, because Mr. Ramirez Valverde has no criminal history and is not a flight risk, he is likely to be granted bond if afforded a hearing. While in many cases, the modest relief sought by the Respondents in good faith may be warranted, here it is not because Respondents request would result in Petitioner being unlawfully detained for an additional six days because of the time it took for service by mail. Petitioner therefore respectfully requests that the Court deny Respondents' requested extension and adhere to its original schedule.

Respectfully submitted this 10th day of October 2025.

/s/ Emily M. Feinstein
Emily M. Feinstein (SBN 1037924)
QUARLES & BRADY LLP
33 East Main Street, Suite 900
Madison, WI 53703
(608) 251-5000
Emily.Feinstein@quarles.com

Kevin Long (SBN 1018128)
Kevin.Long@quarles.com
Michael Ashton (SBN 104849)
Michael.Ashton@quarles.com
QUARLES & BRADY LLP
411 East Wisconsin Ave.
Milwaukee, WI 53202
(414) 277-5000

Laura Graham (SBN 1090423)
laura@cilcmadison.org
COMMUNITY IMMIGRATION LAW CENTER (CILC)
944 East Gorham Street Madison, WI 53703
(608) 640-4444

Attorneys for Petitioner