

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY  
COVINGTON DIVISION

JEIMY HERNANDEZ GOMEZ ( [REDACTED] ), )

Petitioner, )

v. )

Case No. 2:25-cv-00150-DCR

JAMES A. DALEY, Jailer, Campbell County )  
Detention Center; and RUSSELL HOTT, Field )  
Office Director, Chicago Field Office, )  
Immigration and Customs Enforcement, )

Respondents. )

**REPLY TO RESPONDENT JAMES A. DALEY'S RESPONSE  
TO PETITIONER'S HABEAS PETITION**

Petitioner submits this reply to Respondent James A. Daley's Response to her Petition for Writ of Habeas Corpus.

Petitioner agrees that Respondent RUSSELL HOTT is the only proper Respondent, since the only proper respondent in a habeas corpus case is the detainee's immediate custodian. *See Roman v. Ashcroft*, 340 F.3d 314, 320 (6th Cir. 2003). In the immigration context, that is the ICE Field Office Director. *Id.*

Therefore, Petitioner, pursuant to Circuit Rule 21, requests that the Court dismiss Respondent JAMES A. DALEY from the subject matter. There is no prejudice to Respondent RUSSELL HOTT should this Court choose to do so. *Mullins v. C.R. Bard, Inc.*, No. 0:19-CV-85-JMH-EBA, 2020 WL 4288400, at \*1 (E.D. Ky. July 27, 2020) (citing *Philip Carey Mfg. Co. v. Taylor*, 286 F.2d 782, 785 (6th Cir. 1961)).

Dated: November 19, 2025

Respectfully Submitted,

/s/ Lauren E. McClure

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