

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JORGE RAMIREZ MARTINEZ,)
)
Petitioner,)
) No. 25 C 12029
v.)
) Judge Wood
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 Jorge Ramirez Martinez, filed on October 1, 2025. Dkt. 1.

1. The attached documents are taken from Ramirez's administrative file, as maintained by and provided to this office by U.S. Immigration and Customs Enforcement.

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 warrant for the arrest of Ramirez, dated October 1, 2025.

5. The facts contained in Exhibits 1 through 2, as well as the law set forth in the government's contemporaneously filed memorandum in opposition to Ramirez's petition, establish his detention is lawful.

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

Respectfully submitted,

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