

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

XIAOQUAN CHEN,

Petitioner,

-against-

JUDITH ALMODOVAR, Acting Director of the
New York City Field Office of Immigration and
Customs Enforcement, *et al.*,

Respondents.

No. 25 Civ. 8350 (MKV)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the Government respectfully submits this Return, together with the accompanying Memorandum of Law in opposition to the Petition for Writ of Habeas Corpus ECF No. 1 (“Petition”), filed by petitioner Xiaoquan Chen (“Petitioner”), and the Declaration of Supervisory Detention and Deportation Officer Lige Hampton dated November 5, 2025. The attached documents are taken from Petitioner’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement (“ICE”). The below exhibits are true and correct copies of these documents maintained by ICE.

1. Exhibit 1 is a Notice to Appear (Form I-862), dated December 15, 2023.
2. Exhibit 2 is a Record of Deportable/Inadmissible Alien (Form I-213), dated October 8, 2025, with minor redactions to certain personal information of Petitioner.
3. Exhibit 3 is a Warrant of Arrest for Alien (Form I-200) dated October 8, 2025.

The facts contained in Exhibits 1 through 3, and in the Lige Declaration, and the law set forth in the Government’s memorandum of law in opposition to the Petition, establish that Petitioner’s detention is lawful.

WHEREFORE, the Government respectfully requests that the Court enter judgment denying the Petition.

Dated: New York, New York
November 5, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for Respondents

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