

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

AGUSTIN SANTOS RAMIREZ and  
JOSE GUADALUPE SALAZAR GONZALEZ,

Petitioners,

v.

No. 1:25-cv-01008-KWR-JMR

MARISA FLORES, Field Office Director of  
Enforcement and Removal Operations, El Paso  
Field Office, Immigration and Customs  
Enforcement; KRISTI NOEM, Secretary, U.S.  
Department of Homeland Security; U.S.  
DEPARTMENT OF HOMELAND SECURITY;  
PAMELA BONDI, U.S. Attorney General;  
TODD LYONS, Acting Director and Senior  
Official Performing the Duties of the Director  
of U.S. Immigration and Customs Enforcement; and  
GEORGE DEDOS, Warden<sup>1</sup> of Cibola County  
Correctional Center, in their official capacities,

Respondents.

**PETITIONERS' RESPONSE TO NOTICE OF BRIEFING COMPLETE**

Pursuant to Local Rule 7.4, Respondents filed a Notice of Briefing Complete on December 2, 2025. [Doc. 17] The Notice outlined the relevant briefing for the Court's consideration of Respondent's Motion to Dismiss. The Respondents erred when listing the relevant documents, omitting a Notice of Supplemental Authorities filed by Petitioners. [Doc. 15]

As such, Petitioners submit that the correct documents for the Court's consideration are as follows:

- 1) Federal Respondents' Motion to Dismiss [Doc 10, filed November 17, 2025];

- 2) Petitioner's Response in Opposition to Federal Respondents' Motion to Dismiss [Doc. 14, filed November 24, 2025];
- 3) Notice of Supplemental Authorities [Doc. 15, filed December 2, 2025];
- 4) Federal Respondents' Reply in Support of the Motion to Dismiss [Doc. 16, filed December 2, 2025].

As the Respondents assert, briefing of the Federal Respondents' Motion to Dismiss Petition for Writ of Habeas Corpus is complete and is ready for the Court's consideration.

Respectfully submitted,

/s/ Natalie Cauley  
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*Attorneys for Petitioners*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2025, I filed the foregoing pleading electronically through the CM/ECF system which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

*/s/ Natalie Cauley*  
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Natalie Cauley