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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**


RONALDO V.,

Petitioner

-against-

Pam BONDI, in her official capacity as the Attorney General of the United States; Kristi NOEM, in her official capacity as Secretary for the United States Department of Homeland Security; Joseph EDLOW, in his capacity as Director for United States Citizenship and Immigration Services, Robert Lynch, in his capacity as Field Office Director, ERO Detroit and Kevin GRATHWOHL, in his capacity as warden at Butler County Jail.

Respondents.

Agency File No. 
Case No. 1:25-cv-00747

**PETITIONER'S OPPOSITION
TO RESPONDENT'S MOTION
TO DISMISS**

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Now comes Petitioner, by and through below-signed Counsel, and hereby gives notice of opposition to Respondent Kevin Grathwohl's Motion to Dismiss.

On October 29, 2025, Respondent Grathwohl filed a Motion to Dismiss Petitioner's Petition for Writ of Habeas Corpus. In this motion, Respondent alleged that Warden of the Butler County Jail was not a proper party to the proceedings and requested dismissal of the petition as relief. Respondent's motion acknowledged that a contract exists between Butler County and United

States Immigration and Customs Enforcement (“ICE”) for the housing of individuals awaiting deportation process by ICE and that the Respondent does hold such individuals at the Butler County Jail. The Respondent also admitted there is an inmate being held in the Butler County Jail whose initials are R.V.B.

Under 28 U.S.C. 2243, a writ of habeas corpus “shall be directed to the person having custody of the person detained.” Despite Respondent’s claim, as the in-fact custodian of Petitioner, Warden is an appropriate party to this action. Should the Court determine otherwise, the appropriate remedy would be to dismiss Warden as a party, and not to dismiss the entire petition.

Respectfully submitted,

/s/ Carolyn A. Marks

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading was electronically filed on November 10, 2025, and will automatically be served on all the parties for whom counsel has entered an appearance.

/s/ Carolyn A. Marks

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