

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MAURICIO RANGEL TEJADA,

Petitioner,

v.

KRISTI NOEM, et al.,

Respondent.

Civil Action No. 3:25-CV-02896-E-BT

RESPONSE IN OPPOSITION TO PETITION FOR WRIT OF HABEAS CORPUS

In his petition for a writ of habeas corpus under 28 U.S.C. § 2241, Petitioner Mauricio Rangel Tejada challenges his most recent period of detention with the Immigration and Customs Enforcement (ICE), which began on September 25, 2025. As relief, Petitioner seeks release from ICE custody or a bond hearing.

Respondents request that the Court dismiss this action under Federal Rule of Civil Procedure 12(b)(1). Dismissal is appropriate because after Petitioner filed the underlying petition, ICE removed him from the United States on December 16, 2025. (*See attached Exhibit A.*) Given that Petitioner has been removed, he is no longer in ICE custody. He has received all of the relief that he requested and to which he would be entitled if successful in his petition, so there is no further relief that the Court may award. Accordingly, the Court should dismiss the habeas petition for lack of jurisdiction as moot. *See, e.g., Chay v. Holder*, 470 F. App'x 406, 406–07 (5th Cir. 2012); *Singh v. Mukasey*, No. 3:08-CV-

2162-O, 2009 WL 1097255, at *1 (N.D. Tex. Apr. 22, 2009); *Caquias v. Dist. Dir. of ICE*, No. 3:08-CV-1808-D, 2008 WL 5378173, at *1 (N.D. Tex. Dec. 23, 2008).

Respectfully submitted,

RYAN RAYBOULD
UNITED STATES ATTORNEY

/s/ Ann E. Cruce-Haag
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Attorneys for Respondent

CERTIFICATE OF SERVICE

On December 19, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Ann E. Cruce-Haag
ANN E. CRUCE-HAAG
Assistant United States Attorney

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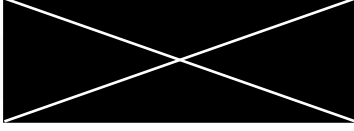
Respondents.

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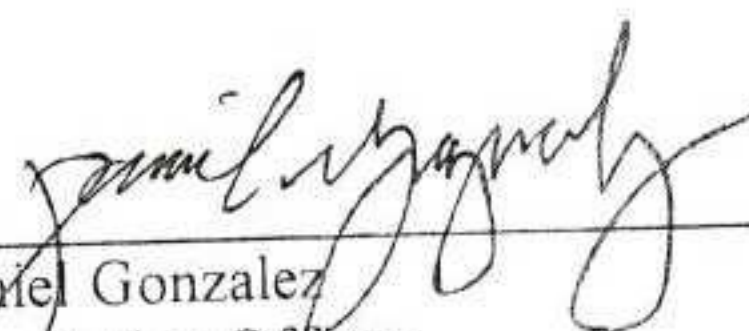
Case No. 3:25-cv-02896-E (BT)

DECLARATION OF DANIEL GONZALEZ

In accordance with the provisions of Section 1746 of Title 28, United States Code, I, the undersigned, Daniel Gonzalez, do hereby make the following declaration, under penalty of perjury in the above-styled and numbered cause:

1. I, Daniel Gonzalez, am presently employed by the United States Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), in the position of Deportation Officer for Enforcement Removal Operations (“ERO”).
2. My duties as a Deportation Officer include the review of alien files and monitoring the custody status of aliens who have a final order of removal. I am responsible for monitoring the progress of obtaining travel documents necessary for removing aliens to the designated country of removal. As a Deportation Officer, I have access to records maintained in the ordinary course of business by ICE.
3. I am familiar to the case Mauricio Rangel-Tejada, (“Rangel-Tejada”), alien file number  a native and citizen of Mexico.
4. On December 16, 2025, Rangel-Tejada was removed from the United States to Mexico.

Sworn to and subscribed this 18th day of December, 2025.



Daniel Gonzalez
Deportation Officer
Department of Homeland Security
Immigration and Customs Enforcement