

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

MAYNOR ESPINOZA HERNANDEZ,

Petitioner,

v.

Case No. 25-CV-1670

SAMUEL OLSON, Field Office Director of
Enforcement and Removal Operations, Chicago Field
Office, Immigration and Customs Enforcement; *et al.*,

Respondents.

**RESPONSE TO PETITIONER'S
REQUEST FOR GRANT OF HABEAS CORPUS PETITION**

Respondents Samuel Olson, Marcos Charles, Kristi Noem, and Pamela Bondi (collectively the "Respondents"),¹ by and through undersigned counsel, respond to the Request for Grant of Habeas Corpus Petition ("Request") filed by Petitioner Maynor Espinoza Hernandez (ECF 5):

1. Petitioner initiated this proceeding by filing a Petition for Habeas Corpus ("Petition") on October 29, 2025. ECF 1.
2. The Court screened the Petition on November 3, 2025, ordered the Clerk serve Respondents and the United States Attorney's Office with copies of the Petition and screening order, and ordered a response "*within three days from service of this Order.*" ECF 3 (emphasis added).

¹ Although the United States Attorney's Office does not formally represent Petitioner's jail custodians, the arguments set forth in this response apply to them as well.

3. Today Petitioner filed the instant Request, arguing that Respondents failed to timely respond to the Petition and requesting the Court to immediately grant the Petition. ECF 5.²

4. As of the filing of this response, however, the United States Attorney's Office has no record of having been served with the Petition and screening order. Accordingly, a response is not yet due.

5. Respondents intend to comply with the screening order when service is complete. For these reasons, Respondents respectfully request that the Court deny Petitioner's Request.

Dated at Milwaukee, Wisconsin this 12th day of November 2025.

Respectfully submitted,

RICHARD G. FROHLING
Acting United States Attorney

By: *s/ Luke Sinclair*

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² Respondents are aware of the Request because the Civil Chief for the U.S. Attorney's Office filed a protective notice of appearance in light of the ongoing government shutdown and prohibition against Department of Justice attorneys, including undersigned, working, even on a voluntary basis, except in very limited circumstances. *See* 31 U.S.C. § 1342.