

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

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Orbin Omar URREA-CALDERON

Petitioner

v.

Kristi Noem, *et al.*,

Respondents.

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Case Number: 8:25-cv-3549

**PETITIONER'S RESPONSE TO RESPONDENTS' MOTION TO DISMISS/TRANSFER**

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Petitioner, by and through undersigned counsel, respectfully submits this Response to Respondents' Motion to Dismiss/Transfer.

At the time Petitioner's undersigned counsel prepared and filed the habeas corpus petition, Petitioner's last known place of detention was in Baltimore, Maryland. It was not until today, October 30, 2025, that Petitioner's undersigned counsel learned that Petitioner had already been transferred to a facility in Texas at the time of the filing of the habeas corpus petition.

Petitioner respectfully opposes dismissal of the habeas petition until this Honorable Court determines jurisdiction. However, should the Court find that it lacks jurisdiction, Petitioner consents to transfer of the case to the appropriate U.S. district court in Texas, to ensure that his claims are heard on the merits.

WHEREFORE, Petitioner respectfully submits Petitioner's Response to Respondents' Motion to Dismiss/Transfer.

Respectfully submitted,

/s/ Ronald D. Richey

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