

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NOUAMANE SIDQUI,

Petitioner,

-against-

JUDITH ALMODOVAR, in her official capacity
as Acting New York Field Office Director, U.S.
Immigration & Customs Enforcement; KRISTI
NOEM, in her official capacity as Secretary, U.S.
Department of Homeland Security; TODD M.
LYONS in his official capacity as Acting Director
of Immigration & Customs Enforcement, and PAM
BONDI, in her official capacity as Attorney
General, U.S. Department of Justice,

Respondents.

Case No. 25 Civ. 9349 (VSB)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the Government respectfully submits this Return, together with the accompanying Memorandum of Law in opposition to the Petition for Writ of Habeas Corpus ECF No. 1 (“Petition”), filed by petitioner Nouamane Sidqui (“Petitioner”), and Declaration of Deportation Officer Justin James-Townend, dated November 20, 2025. The attached documents are taken from Petitioner’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement. The below exhibits are true and correct copies of these documents.

1. Exhibit 1 is a Record of Deportable/Inadmissible Alien (Form I-213), dated August 9, 2024.
2. Exhibit 2 is a Determination of Inadmissibility and Order of Removal (Form I-860), dated August 10, 2024.

3. Exhibit 3 is a Notice To Alien Ordered Removed/Departure Verification (Form I-296), dated August 10, 2024.

4. Exhibit 4 is a Notice to Appear (Form I-862), dated August 28, 2024.

5. Exhibit 5 is a Notice To EOIR: Alien Address (Form I-830E), dated September 20, 2024, notifying the Executive Office for Immigration Review (EOIR), *i.e.*, the immigration court, of a noncitizen's current address and detention status.

6. Exhibit 6 is a Warrant for Arrest of Alien (Form I-200), dated November 7, 2025.

The facts contained in Exhibits 1 through 6, and in the Declaration of Deportation Officer James-Townend, and the law set forth in the Government's memorandum of law in opposition to the Amended Petition, establish that Petitioner's detention is lawful.

WHEREFORE, the Government respectfully requests that the Court enter judgment denying the Petition.

Dated: New York, New York
November 20, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for Respondents

By: /s/ Brandon Cowart
BRANDON H. COWART
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Telephone: (212) 637-2693
E-mail: brandon.cowart@usdoj.gov