

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JAYSON TIKUM MBABID,

Petitioner,

v.

NIKITA BAKER, Acting Director, U.S.
Immigration and Customs Enforcement
Baltimore Field Office, *et al.*

Respondents.

Case No. 8:25-cv-03505-MJM

**MOTION TO DISMISS FOR LACK OF
SUBJECT-MATTER JURISDICTION, OR ALTERNATIVELY TO TRANSFER**

Respondents, by undersigned counsel, pursuant to Federal Rule of Civil Procedure 12(b)(1), hereby move to dismiss the above-captioned case for lack of subject-matter jurisdiction. Alternatively, Respondents move to transfer this case to the Western District of Texas. The grounds and authorities for this Motion are set forth in the accompanying Memorandum of Law, which Respondents incorporate herein by reference.

WHEREFORE, Respondents respectfully request that the Court grant the relief requested and enter the attached proposed order.

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/ Ariana Wright Arnold
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Dismiss or Transfer was e-filed and thereby served on counsel of record.

/s/ Ariana Wright Arnold
Ariana Wright Arnold
Assistant United States Attorney