

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)

CARLOS ANTONIO SOLIS NOLASCO, *

Petitioner, *

Case No. 8:25-cv-03847-GLR

v. *

KRISTI NOEM, *et al.*, *

Respondents. *

* * * * *

**RESPONSE TO AMENDED PETITION FOR
WRIT OF HABEAS CORPUS AND MOTION TO DISMISS**

Respondents, United States Department of Homeland Security (“DHS”) Secretary Kristi Noem, ICE Acting Director Todd Lyons, United States Immigration and Customs Enforcement (“ICE”) Baltimore Field Office Acting Director Jeremy Bacon, and United States Attorney General Pamela Bondi (collectively, “Respondents”), by and through undersigned counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, and Beatrice C. Thomas, Assistant United States Attorney for that District, hereby respond to the Petition for Writ of Habeas Corpus (ECF No. 1) (the “Petition”) filed by Carlos Antonio Solis Nolasco and further move to dismiss the Petition in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(6) for the reasons set forth in the accompanying Memorandum of Law, which is incorporated by reference herein.

WHEREFORE, Respondents respectfully request that the Court deny the Petition and dismiss it in its entirety.

Dated: December 8, 2025

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/ Beatrice C. Thomas
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Counsel for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of December, 2025, a copy of the foregoing Response to Amended Petition for Writ of Habeas Corpus and Motion to Dismiss with the accompanying Memorandum of Law in Support thereof and all supporting exhibits was served via CM/ECF on all parties and counsel receiving electronic notice in this case.

/s/ Beatrice C. Thomas
Beatrice C. Thomas (Bar No. 21969)
Assistant United States Attorney