

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

DAMASINA SABINA PEREZ-AYQUIPA,	*	
	*	
Petitioner,	*	
	*	Case No. 8:25-cv-03982-ABA
v.	*	
	*	
KRISTI NOEM, <i>et al.</i> ,	*	
	*	
Respondents.	*	
	*	
* * * * *		

JOINT STATUS REPORT WITH PROPOSED ORDER

Petitioner, Damasina Sabina Perez-Ayquipa, and Respondents, United States Department of Homeland Security Secretary Kristi Noem, United States Immigration and Customs Enforcement (“ICE”) Acting Director Todd Lyons, and ICE Baltimore Field Office Acting Director Jeremy Bacon,¹ by and through their respective undersigned counsel, submit this Joint Status Report and state:

On December 4, 2025, Petitioner Damasina Sabina Perez-Ayquipa filed a Petition for a Writ of Habeas Corpus and a Motion for a Temporary Restraining Order. ECF Nos. 1, 2. Upon the filing of the Petition, Respondents’ counsel obtained information from Respondents concerning Petitioner’s detention, including that Respondents took Petitioner into custody pursuant to their authority under 8 U.S.C. § 1226 due to numerous violations of Petitioner’s Alternatives to Detention (“ATD”) agreement. Petitioner disputes that she has violated her ATD agreement. Notwithstanding the dispute over the ATD violations, the parties agree that: (i)

¹ Pursuant to Federal Rule of Civil Procedure 25(d), upon the departure of a public officer sued in their official capacity, “[t]he officer’s successor is automatically substituted as a party.” FED. R. CIV. P. 25(d). Jeremy Bacon has recently been named Acting Field Office Director for the ICE Baltimore Field Office. Thus, he is automatically substituted as the respondent for former-Acting Field Office Director Nikita Baker.

Petitioner's detention is discretionary pursuant to 8 U.S.C. § 1226, not 8 U.S.C. § 1225; and (ii) 8 U.S.C. § 1226 and 8 C.F.R. § 236.1(d) provide that Petitioner is entitled to a bond hearing under 8 U.S.C. § 1226(a) with an Immigration Judge considering the application for bond under the factors of *Matter of Guerra*, 24 I. & N. Dec. 37 (BIA 2006). Petitioner anticipates filing a request for a bond hearing with the Immigration Court promptly.

Because the grant of a bond hearing may moot this case, the parties agree that Petitioner should pursue the bond hearing first before further action in this case is taken. Accordingly, the parties propose to stay briefing in this matter while Petitioner seeks a bond hearing and subsequently submit a Joint Status Report addressing the status of the bond hearing issue. The parties submit the attached proposed Order for the Court's consideration.

Dated: December 8, 2025

Respectfully submitted,

/s/ Ronald D. Richey
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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 Joint Status Report with Proposed Order was served electronically on all parties and counsel receiving service via CM/ECF in this case.

/s/ Megan L. Micco
Megan L. Micco (Bar No. 20936)
Assistant United States Attorney