UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MIGDALIA JOSEFINA PEREZ QUINTERO,

Petitioner,

v.

LADEON FRANCIS, *et al.*,

Respondents.

No. 25 Civ. 10107 (MKV)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the Government respectfully submits this Return, together with the accompanying letter brief in opposition to the Petition for Writ of Habeas Corpus ("Petition") (ECF No. 1), filed by petitioner Migdalia Josefina Perez Quintero ("Petitioner"), and the Declaration of Assistant Field Office Director Matthew W. Reaves, dated December 8, 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.

1. Exhibit A is a copy of the Form I-213 Record of Deportable/Inadmissible Alien, dated September 11, 2022.

2. Exhibit B is a copy of the Form I-200 Warrant for Arrest of Alien, dated December 4, 2025.

3. Exhibit C is a copy of the Form I-213 Record of Deportable/Inadmissible Alien, dated December 4, 2025.

4. Exhibit D is a copy of the Notice to Appear, dated December 4, 2025.

The facts contained in Exhibits A through D, and in the Reaves Declaration, and the law set forth in the Government's letter brief in opposition to the 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
December 9, 2025

Respectfully submitted,

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

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