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 FIRST AMENDED PETITION FOR WRIT OF HABEAS CORPUS

Under 28 U.S.C. § 2243, the Government respectfully submits this Return, together with the accompanying memorandum in law in opposition to the First Amended Petition for Writ of Habeas Corpus ("Amended Petition") (ECF No. 11), filed by petitioner Migdalia Josefina Perez Quintero ("Petitioner"), the Declaration of Assistant Field Office Director Matthew W. Reaves, dated December 8, 2025 (ECF No. 8), and the Declaration of Supervisory Detention and Deportation Officer Derrick D. McClung, dated December 23, 2025. The attached documents are taken from Petitioner's administrative file and records at the Richwood Correctional Facility in Richwood, Louisiana, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement ("ICE").

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.

5. Attached hereto as **Exhibit E** is a true and correct copy of Petitioner's medical records provided to me by ICE. Because this matter concerns immigration detention such that remote access is restricted under Fed. R. Civ. P. 5.2(c), these medical records have not been redacted for filing because they are exempt from the redaction requirements of Fed. R. Civ. P. 5.2(b)(5).

The facts contained in Exhibits A through E, the Reaves Declaration, and the McClung Declaration, 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 First Amended Petition.

Dated: New York, New York
December 23, 2025

Respectfully submitted,

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

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