

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

NOE NAHUN TORRES REYES,	*	
Petitioner,	*	Case No. 8:25-cv-04143-MJM
v.	*	
PAMELA BONDI, <i>et al.</i> ,	*	
Respondents.	*	
* * * * * * * * * * * *		

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

Respondents, United States Attorney General Pamela Bondi, United States Department of Homeland Security Secretary Kristi Noem, United States Immigration and Customs Enforcement (“ICE”) Acting Director Todd Lyons, and the ICE Baltimore Field Office Acting Director (collectively, “Respondents”), by and through undersigned counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, and Megan L. Micco, Assistant United States Attorney for that District, hereby respond to the Petition for Writ of Habeas Corpus (ECF No. 1) (the “Petition”) filed by Petitioner Noe Nahun Torres Reyes and further move to dismiss the Petition in its entirety pursuant to Federal Rules of Civil Procedure 12(b)(1) and 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 30, 2025

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/ Megan L. Micco
Megan L. Micco (Bar No. 20936)
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Counsel for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of December, 2025, a copy of the foregoing Response to 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/ Megan L. Micco
Megan L. Micco (Bar No. 20936)
Assistant United States Attorney