

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 0:26-cv-00337- KMM/JFD

Martinez Sandoval,

Petitioner,

v.

Kristi Noem, *et al.*,

Respondents.

**FEDERAL RESPONDENTS'  
RESPONSE TO PETITION  
FOR WRIT OF HABEAS  
CORPUS**

Petitioner filed this petition for a writ of habeas corpus to secure a bond hearing in connection with Petitioner's detention by the U.S. Immigration and Customs Enforcement. This petition raises legal and factual issues similar to those in prior habeas petitions this Court has decided. Those issues are currently before the Eighth Circuit on expedited review in *Avila v. Bondi*, No. 25-3248 (8th Cir. docketed Nov. 10, 2025). For purposes of expediting these proceedings, the Federal Respondents assert all arguments raised by the government in *Avila*, preserve those arguments for any appeal in this case, and respectfully request that the Court deny Petitioner's habeas petition.

Dated: January 16, 2026

DANIEL N. ROSEN  
United States Attorney

s/Julie Le  
FOR: JULIE LE  
Special Assistant U. S. Attorney  
Attorney ID Number 0402305  
600 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
(612) 664-5600  
Julie.T.Le@ice.dhs.gov  
Attorneys for Respondents