

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. Civil No. 26-CV-419 (PAM-SGE)

M.S.V.I.,

Petitioner,

v.

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

PAMELA BONDI, *et al.*,

Respondents.

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.

BACKGROUND

Petitioner claims to be a citizen of Ecuador. Pet. ¶ 7 page 2. He claims his name is MSVI, A # XXX-XXX-865, and date of birth XX/XX/2009. The Respondents have reviewed the information provided and found no arrest associated with A # XXX-XXX-865. However, we did find an individual named, S.V., with a different A# XXX-XXX-256, but the same DOB, and at the same location on the specific date stated on the petition, January 16, 2026. Pet. ¶ 6, page 5).

ARGUMENT

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 21, 2026

DANIEL N. ROSEN
United States Attorney

s/ Julie Le

BY: JULIE T. LE
Special Assistant United States 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