

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SAUL JUAREZ SANCHEZ,

Petitioner,

v.

VERNON LIGGINS,

Respondent.


Case No. 1:26-cv-00742-LKG


RESPONSE TO PETITIONER'S NOTICE

Respondents, by and through counsel, Kelly O. Hayes, United States Attorney for the District of Maryland, S. Nicole Nardone, Assistant United States Attorney for that district, hereby file its Response to Petitioner's Notice Regarding Petitioner's Status ("Petitioner's Notice") (ECF No. 18) and provide the following:

On March 20, 2026, Petitioner's counsel filed with the Court Petitioner's Notice, providing unsworn statements of counsel regarding an "emergent medical situation" Petitioner was experiencing relating to hyperuricemia.¹ Hyperuricemia is defined as a condition that involves "an excess of uric acid in the blood, often caused by the kidneys under-excreting uric acid or the body overproducing it. While usually asymptomatic, it can lead to gout, kidney stones and chronic kidney disease." See <https://my.clevelandclinic.org/health/diseases/17808-hyperuricemia-high-uric-acid-level>

¹ Petitioner's Notice contains no information regarding the source of the allegations related to Petitioner's health, *i.e.*, it is unclear if the allegations come from Petitioner or someone else. See *gen.* ECF No. 18.

Following Petitioner's detention, undersigned counsel communicated with Petitioner's counsel regarding their concerns that Petitioner receive his medication for hyperuricemia. On February 26, 2026, Petitioner's counsel emailed a copy of Petitioner's medication for his condition to undersigned counsel. 

 The same day, undersigned counsel forwarded the prescription to ICE's Office of Principal Legal Advisor ("OPLA") to send to the Winn Correctional Center where Petitioner was being detained. *Id.*

The attached declaration from Ali Higgs, LPN, HAS, with the Winn Correctional Center, provides details regarding Petitioner's treatment and care since his transfer to the facility on February 25, 2026. *See Exhibit B, Declaration of Ali Higgs, LPN, HSA.* Notably, the declaration shows that Petitioner was prescribed and began receiving, as of February 26, 2026, the same medication and dosage Petitioner's counsel had indicated he required. *Id.* at ¶ 7. The declaration also provides that, although Petitioner experienced an exacerbation of his condition in early March, he was successfully treated and, as of March 24, 2025, reported feeling "much better." *Id.* at ¶¶ 9-13.

Since the filing of Petitioner's Notice, undersigned counsel (who was on annual leave until yesterday, March 25, 2026) has acted diligently to obtain information regarding Petitioner's medical condition. Undersigned counsel obtained and provided this information as soon as possible given the time constraints.

Respectfully submitted,

Date: March 26, 2026

KELLY O. HAYES
United States Attorney

/s/ S. Nicole Nardone

S. Nicole Nardone
Assistant United States Attorney
United States Attorney's Office, District of Maryland
36 South Charles Street, Fourth Floor
Baltimore, Maryland, 21201
Telephone: (410) 209-4882
Email: Nicole.Nardone@usdoj.gov

Counsel for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of March, 2026, all parties that have entered an appearance in this matter have been served via ECF/PACER.

/s/ S. Nicole Nardone
S. Nicole Nardone