

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

INGRIS CORNEJO CASTRO,

Petitioner,

v.

KRISTI NOEM, et al.,

Respondents.

Civil Action No. 8:26-cv-00985-PX

**RESPONDENT'S SUPPLEMENTAL RESPONSE TO RESPONDENT'S
ANSWER/MOTION TO DISMISS AMENDED PETITION FOR WRIT OF HABEAS
AND RESPONSE IN OPPOSITION FOR TEMPORARY RESTRAINING ORDER**

Respondents, by and through undersigned counsel, Kelley O. Hayes, United States Attorney for the District of Maryland, and Ivory Macklin, Special Assistant United States Attorney for that district, file this Supplemental Response to the Respondent's Answer and Motion to Dismiss Amended Petitioner for Writ of Habeas and Response in Opposition for Temporary Restraining Order (ECF 12) (MTD), and states as follows:

I. SUPPLEMENT

On March 24, 2026, Respondent's counsel received communications that the same day that the MTD was filed, United States Customs and Immigration Service (USCIS), issued an NTA and forwarded the application for asylum to the Executive Office of Immigration Review (EOIR). Despite this change in facts, as the forwarded filing is for asylum and not withholding of removal only, Respondents otherwise stand by their arguments made and request for dismissal in the MTD.

CONCLUSION

For the above reasons and those previously made in the MTD, Petitioner's assertion of unlawful detention in violation of statute, regulation, and the Constitution fails. As such, this Court should deny her request for immediate release in both the Petition for Habeas and Motion for Temporary Restraining Order.

Dated: March 24, 2026

Respectfully submitted,

Kelly O. Hayes
United States Attorney

By: /s/ Ivory Macklin
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of March, 2026, a copy of the foregoing Joint Status Report and Proposed Briefing Schedule was served electronically on all parties receiving service via CM/ECF in this case.

/s/ Ivory Macklin
Ivory L. Macklin
Special Assistant United States Attorney