

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Cesar Augusto Godoy Corrales,

Petitioner,

v.

Vernon Liggins, *et al.*,

Respondents.

Action No. 1:26-cv-788

PETITIONER'S RESPONSE TO RESPONDENTS' REQUEST TO TRANSFER

Petitioner, by counsel, responds to Respondents' request to transfer, ECF No. 7, and states as follows:

1. Respondents contend that Petitioner was transferred out of Maryland on February 19, 2026, and was detained at the Folkston Main ICE Processing Center in Folkston, Georgia, by February 22, 2026—before the Petition was filed on February 25, 2026. ECF No. 7.
2. In view of Respondents' representation that Petitioner was physically confined in Folkston, Georgia, at the time of filing, and in light of *Rumsfeld v. Padilla*, 542 U.S. 426 (2004), Petitioner agrees that transfer of this action is appropriate.
3. Petitioner respectfully requests that, if the Court transfers this matter, it transfer the case to the **United States District Court for the Southern District of Georgia**, which is the district identified throughout Respondents' memorandum as the district of confinement. See ECF No. 7 at 1, 5. Petitioner notes that the final sentence of Respondents' conclusion appears to request transfer to the Middle District of Florida, which appears inconsistent with the factual allegations in the motion and is presumably a scrivener's error. *Id.* at 5.

4. Petitioner does **not** consent to dismissal. Transfer, rather than dismissal, is the appropriate course so that the habeas petition may proceed without unnecessary delay.
5. By consenting to transfer, Petitioner does not waive any argument on the merits of his habeas claims, including his challenge to Respondents' determination that he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2) rather than detention under 8 U.S.C. § 1226(a).

WHEREFORE, Petitioner respectfully requests that this Court transfer this action to the United States District Court for the Southern District of Georgia and grant such other and further relief as the Court deems just and proper.

Respectfully Submitted,

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