

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MELVIN GONZALEZ RAMIREZ,

Petitioner,

v.

MICHAEL A. WILLIAMS, in his official
capacity as Jail Commander for the
Cobb County Sheriff's Office;

CRAIG D. OWENS, in his official
capacity as Cobb County Sherriff;

KRISTEN SULLIVAN, in her official
capacity as Acting Field Office
Director of the U.S. Immigration and
Customs Enforcement, Enforcement
and Removal Operations Atlanta Field
Office;

DAVID VENTURELLA, in his official
capacity as the Acting Director of U.S.
Immigration and Customs
Enforcement;

MARKWAYNE MULLIN, in his official
capacity as Secretary of the
Department of Homeland Security;
and

TODD BLANCHE, in his official
capacity as Acting Attorney General;

Respondents.

Civil Action No.
1:26-CV-03334-ELR-RDC

PARTIAL OPPOSITION TO MOTION FOR ORDER TO SHOW CAUSE

Petitioner seeks an order to show cause (Doc. 2.) In his motion, Petitioner first asks that Respondents be ordered to respond to his petition within seven days. On that point, the federal Respondents have no objection. Seven days should be enough time to respond to the petition, and Respondents will return to the Court with a new request if they need more time.

Petitioner next asks the Court to order that he not be transferred out of the Northern District of Georgia. Here, Respondents object. This District does not have a long-term detention facility. The local facility is meant for short-term stays (less than 72 hours) and does not have amenities like showers or permanent beds. Keeping someone here is not feasible. Also, visitors are generally not permitted in the local short-term facility, so access to counsel is likely to be better, not worse, if he stays here. The longer-term facilities (like Stewart and Folkston, both in the Middle District of Georgia) provide regular access to counsel via videoconference. For this reason, when recently presented with a similar request, Judge Calvert enjoined Respondents “from moving Petitioner outside of the Northern **or Middle** Districts of Georgia.” Order to Show Cause, *Thuy v. Sullivan*, No. 1:26-CV-006333-VMC-JEM (N.D. ga. May 1, 2026) (Doc. 7) (emphasis added). That is the better approach.

Respectfully submitted,

THEODORE S. HERTZBERG
United States Attorney

s/ Anthony C. DeCinque
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Counsel for the Respondents

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed using the Court's CM/ECF system, which will provide notice to all counsel of record.

This 16th day of June, 2026.

s/ Anthony C. DeCinque
ANTHONY C. DECINQUE