

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

PAULO CESAR GAMEZ LIRA,

Petitioner,

v.

No. 1:25-cv-00855-WJ-KK

KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security; PAMELA BONDI, in her official capacity as Attorney General of the United States; TODD LYONS, in his official capacity as Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement; MARY DE ANDA-YBARRA, in her official capacity as Field Office Director of the El Paso Field Office of U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations; and DORA CASTRO, in her official capacity as Warden of the Otero County Processing Center,

Respondents.

RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS (DOC. 1)

Respondents hereby submit this response to the Petition for Writ of Habeas Corpus (Doc. 1), pursuant to the Court's expedited briefing schedule (Doc. 18), stating the following:

1. Respondents do not oppose the central relief sought by Petitioner, specifically release from custody. *See* Doc. 1 at 20 ¶ E. To the extent Petitioner requests any additional relief, Respondents would oppose.
2. Respondents respectfully contend this position moots any and all remaining matters before the Court in the above-captioned case.
3. This limited statement of non-opposition does not admit the factual allegations

made in the Petition for Writ of Habeas Corpus (Doc. 1) nor does it concede the legal arguments articulated therein.

Respectfully submitted,

/s/ Ryan Ellison

RYAN ELLISON

Acting United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2025, I filed the foregoing pleading electronically through the CM/ECF system which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan Ellison

RYAN ELLISON

Acting United States Attorney