UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHAWNET NICKESHA MCDONALD,

Petitioner,

-against-

LADEON FRANCIS, In His Official Capacity as Acting Director of the New York City Field Office of Immigration and Customs Enforcement, *et al*

Respondents.

No. 25 Civ. 9355 (JAV)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the Government respectfully submits this Return, together with the accompanying Memorandum of Law in opposition to the Petition for Writ of Habeas Corpus filed on behalf of petitioner Shawnet Nickesha McDonald ("Petitioner), and the Declaration of Supervisory Detention and Deportation Officer Lige Hampton dated November 20, 2025. The attached documents are taken from Petitioner's administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement ("ICE"). The below exhibits are true and correct copies of these documents maintained by ICE.

1. Exhibit 1 is a Notice to Appear (Form I-862), dated January 31, 2023.

2. Exhibit 2 is a Record of Deportable/Inadmissible Alien (Form I-213), dated January 31, 2023, with minor redactions to certain personal information of Petitioner.

3. Exhibit 3 is a Notice of Custody Determination (Form I-286), dated January 31, 2023.

4. Exhibit 4 is an Order of Release on Recognizance (Form I-220A), dated February 1, 2023.

5. Exhibit 5 is a Warrant of Arrest for Alien (Form I-200), dated November 7, 2025.

The facts contained in Exhibits 1 through 5, and in the Hampton Declaration, and the law set forth in the Government's memorandum of law in opposition to the Petition, establish that Petitioner's detention is lawful.

WHEREFORE, the Government respectfully requests that the Court enter judgment denying the Petition.

Dated: New York, New York
November 20, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for Respondents

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