

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 0:26-cv-00121-LMP-SGE

JUAN EDUARDO GALLARDO GARCIA,

Petitioner,

v.

**FEDERAL RESPONDENTS'
RESPONSE TO PETITION FOR
WRIT OF HABEAS CORPUS**

PAMELA BONDI, *et al.*,

Respondents.

Petitioner Juan Eduardo Gallardo Garcia's habeas petition alleges that he is currently being detained following a final order of an immigration judge directing that he be removed to Mexico. Respondents Pamela Bondi, Kristi Noem, Todd M. Lyons, Marcos Charles, Peter Berg, the U.S. Immigration and Customs Enforcement ("ICE"), and the Department of Homeland Security (collectively, the "Federal Respondents") respectfully respond to the petition as follows:

1. As of the time of this filing, ICE has been unable to provide the Federal Respondents' undersigned counsel with "[s]uch affidavits and exhibits as are needed to establish the lawfulness and correct duration of [Petitioner]'s detention in light of the issues raised in the Petition." Dkt. 3, at 2.
2. Although the Federal Respondents do not necessarily agree with every factual allegation or legal contention in the petition, they acknowledge that the petition comprises the entire record before the Court at this point.
3. Based on the facts currently available to the Federal Respondents' undersigned counsel—and as informed by case law—there is an insufficient legal or factual

basis to oppose the petition, and an order directing Petitioner's release would be appropriate.

Dated: January 16, 2026

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s/ Trevor Brown

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