UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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VINCENZO PULLARA,

Petitioner-Plaintiff,

--against--

25-CV-870
(Gujarati, J.)
(Henry, M.J.)

BILL JOYCE, in his official capacity as New York Field Office Director, U.S. Immigration and Customs Enforcement, *et al.*,

Respondents-Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Marlon G. Gordon, and upon Memorandum of Law in Support of Respondents-Defendants' Motion to Dismiss, Respondents-Defendants Bill Joyce, in his official capacity as New York Field Office Director for U.S. Immigration and Customs Enforcement ("ICE"); Caleb Vitello, in his official capacity as the Acting Director for ICE; Kristi Noem, in her official capacity as Secretary of the U.S. Department of Homeland Security; and ICE (collectively, "Respondents"), will move this Court before the Honorable Diane Gujarati, United States District Judge for the Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza, Brooklyn, New York, at a date and at a time to be set by the Court, for judgment dismissing this action, pursuant to Federal Rule of Civil Procedure 12(b)(1), (6) and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Order of the Court dated April 22, 2025, Petitioner-Plaintiff Vincenzo Pullara is to serve his answering papers by June 9, 2025; and Defendants are to serve any reply papers, and file the fully-briefed motion on ECF, by June 25, 2025.

Dated: Brooklyn, New York
May 9, 2025

Respectfully submitted,

JOSEPH NOCELLA, JR.
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Eastern District of New York
Attorney for Respondents-Defendants
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/s/ Elliot M. Schachner

By: _____
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(by electronic mail)