U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

May 12, 2025

Via ECF

Honorable Pamela H. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *L.G.M. v. Anthony J. LaRocco et al.*
Civil Action No. 25 CV 2631 (Chen, J.)

Dear Judge Chen:

This Office represents Respondents William P. Joyce, in his capacity as Acting Field Office Director, New York City Field Office, U.S. Immigration and Customs Enforcement ("ICE"); Kristi Noem, in her official capacity of Secretary, U.S. Department of Homeland Security; and Pamela Bondi, in her official capacity as Attorney General, U.S. Department of Justice (collectively, the "Federal Respondents") in this action. Federal Respondents respectfully submit this letter in response to the Court's May 12, 2025 Scheduling Order ("May 12, 2025 Order") and Petitioner's Letter Motion, dated May 12, 2025 ("Letter Motion"). Dkt. No. 8. Additionally, the Federal Respondents has advised ICE of the Court's Order on Petitioner's Letter Motion that issued within the last hour.

Federal Respondents can confirm that Petitioner is presently in ICE detention at the Pine Prairie Correctional Facility, Pine Prairie, LA ("PPCF"). Dkt. No. 8-3. ICE transferred Petitioner from the Nassau County Correctional Center ("NCCC") to PPCF on Saturday, May 10, 2025, some 48 hours prior to this Court having issued the May 12, 2025 Order. Federal Respondents can further confirm that they advised Petitioner's counsel on Friday evening that ICE would not agree to Petitioner's request that he remain at the NCCC while his Habeas petition was considered by the Court. In addition, Petitioner's counsel copied this Office on an email submission to Judge Donnelly's chambers, received by this Office at 7:57 p.m., seeking guidance on Judge Donnelly's "preferred procedures for ruling on emergency relief." See Ex. A. The Federal Respondents received an additional email from Petitioner's counsel on Friday evening that attached copies of a motion to file documents under seal. That was the last communication the Federal Respondents received from Petitioner's Counsel until its filings today. Moreover, to the Federal Defendants

knowledge, this Court's May 12, 2025 Order is the first Order issued in this case. This Office is obtaining additional information relevant to this case and will be providing it to the Court and Petitioner.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: JAMES KNAPP Digitally signed by JAMES KNAPP Date: 2025.05.12 17:59:07 -04'00'

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cc: **Via ECF**
Petitioner's counsel