U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

May 13, 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. The Federal Respondents respectfully submit this letter in advance of today's 4:00 p.m. hearing to advise that Petitioner is not subject to a final order of removal and will not be removed until the conclusion of removal proceedings, including any administrative appeals.

Further, omitted from all of Petitioner's filings in this case to date was the reason for his transfer from the Orange County, New York facility to the Nassau County Correctional Facility. Petitioner was cited for violations while detained in Orange County, including fighting with other detainees, concealing contraband and destruction of facility property.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: JAMES KNAPP Digitally signed by JAMES KNAPP Date: 2025.05.13 15:34:57 -04'00'
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Assistant United States Attorney
(631) 715-7879

cc: **Via ECF**

Petitioner's counsel