U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

August 22, 2025

Via ECF

Honorable Pamela K. 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 Federal Respondents Judith Almodovar,[1] in her official 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 ("Federal Respondents") in the above-referenced habeas proceeding.

The Federal Respondents respectfully submit this letter to request leave to respond to Petitioner's memorandum, submitted in response to the Court's July 31, 2025 memorandum and order. Dkt. 46-47. The Federal Respondents propose a deadline of August 29, 2025.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: JAMES KNAPP Digitally signed by JAMES KNAPP Date: 2025.08.22 07:48:47 -04'00'
James H. Knapp
Assistant United States Attorney
(631) 715-7879

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

[1] Pursuant to Fed. R. Civ. P. 25(d), Judith Almodovar, the successor to former Federal Respondent William P. Joyce, is "automatically substituted as a party."