August 13, 2025

By ECF
The Honorable Orelia E. Merchant
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Notice in *Rodriguez Orellana v. Francis*, 1:25-cv-04212

Dear Judge Merchant,

Our organization represents the Petitioner in the matter referenced above, Mr. Jhon Rodriguez Orellana. Several of Petitioner's claims hinge on whether Respondents unlawfully revoked his "parole" when they detained him while exiting his immigration court hearing in June 2025. Respondents' opposition memorandum, filed last night around midnight (ECF No. 9), asserts that Petitioner's parole had previously been set to "expire" on April 18, 2025, thereby rending notice unnecessary. ECF No. 9 at 20, 23, 28. This factual assertion forms a critical component of Respondents' defense.

In anticipation of today's hearing and in light of this new factual allegation, we wish to bring to the Court's attention the annexed government-issued record. It shows that, as explained in the petition in this matter, Petitioner's parole was actually set to last until December 17, 2026. ECF No. 1 at 1, 5. To the extent the Court deems it helpful to resolve this new factual dispute and to address the complex legal issues raised by Respondents, Petitioner is prepared to offer a formal reply and intends to seek leave of the Court to file one at the hearing today.

We appreciate the Court's attention to this matter.

Respectfully,

/s/ Harold A. Solis
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Cc: Counsel of Record (by ECF)