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October 27, 2025

The Honorable Lawrence J. Vilardo
United States District Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

**Re: Seraquive Paqui v. Freden, et al.
25-CV-01029-LJV**

Dear Judge Vilardo:

On October 17, 2025, we had a status conference on the above-captioned matter. The Court ordered that the government file a response to the Emergency Motion for a Temporary Restraining Order by October 24, 2025, and my reply by October 27, 2025. The Court also scheduled a Virtual Oral Argument for October 29, 2025 at 1:30 P.M.

As of this time, I have not received a response from the Respondents on this matter. I am filing this letter to inform the Court that since no response was filed, I have nothing to reply to, and as such I ask the Court to grant the relief requested in the motion.

Respectfully submitted,

/s/ Matthew Borowski

Matthew Borowski
Counsel for Petitioner