

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ALI LIEOGO,

Petitioner,

v.

25-CV-06615-EAW

JOSEPH FREDEN, in his official capacity as Deputy Field
Office Director, Buffalo Field Office, U.S. Immigration and
Customs Enforcement, et al.

Respondents.

NOTICE OF MOTION

MOVING PARTY:

Respondents

PLACE:

The Honorable Elizabeth A. Wolford
Chief United States District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, New York 14614

RELIEF SOUGHT:

Respondents respectfully move for an Order
dismissing the Petition pursuant to Federal Rule
of Civil Procedure 12(b)(6).

RETURN DATE:

Absent court order, Local Rule of Civil
Procedure 12(b)(2)(B) provides that any
responding papers be filed within 14 days of the
motion and any reply filed within 7 days of the
responding papers.

PAPERS SUBMITTED:

Memorandum of Law

Respondents reserve the right to submit reply papers to any opposition which may be
filed.

Respectfully submitted,

MICHAEL DIGIACOMO
United States Attorney
Western District of New York

BY: /s/ADAM A. KHALIL
Assistant United States Attorney
100 State Street, Suite 500
Rochester, New York 14614
(585) 399-3979
adam.khalil@usdoj.gov

DATED: November 10, 2025
Rochester, New York