

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

LUIS ERNESTO MARTINEZ-
POCASANGRE,

Petitioner,

VS.

Civil Action No. 1:25cv1898

RUSS HOTT,
Field Office Director, U.S.
Immigration & Customs
Enforcement, *et al.*,

Respondents.

NOTICE OF WAIVER OF HEARING

PLEASE TAKE NOTICE that the federal respondents hereby waive oral hearing on their motion for partial vacatur based on intervening events and thus agree to have the motion decided on the papers alone.

///

///

Respectfully submitted,

LINDSEY HALLIGAN
UNITED STATES ATTORNEY AND
SPECIAL ATTORNEY

TODD W. BLANCHE
DEPUTY ATTORNEY GENERAL

ROBERT K. MCBRIDE
FIRST ASSISTANT UNITED STATES
ATTORNEY

/s/
DENNIS C. BARGHAAN, JR.
Chief, Civil Division
Assistant United States Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3891
Fax: (703) 299-3983
Email: dennis.barghaan@usdoj.gov

ATTORNEYS FOR FEDERAL
RESPONDENTS

Date: December 29, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing ("NEF") to the following:

Lauren Rachel O'Neal
Yacub Law Office
12761 Darby Brook Court, Suite 102
Woodbridge, Virginia 22192
Email: loneal@yacublawn.com

Date: December 29, 2025

/s/
DENNIS C. BARGHAAN, JR.
Chief, Civil Division
Assistant U.S. Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314
Telephone: (703) 299-3891
Fax: (703) 299-3983
Email: dennis.barghaan@usdoj.gov

ATTORNEYS FOR FEDERAL RESPONDENTS