U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

November 5, 2025

By ECF

Honorable Nusrat J. Choudhury
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Erika Rodriguez-Acurio v. Judith Almodovar et al.*,
Civil Action 25-cv-6065 (Choudhury, J.)

Dear Judge Choudhury:

This Office represents Respondents Judith Almodovar, Acting Director, New York City Field Office, Immigration and Customs Enforcement ("ICE"); Kristi Noem, Secretary, U.S. Department of Homeland Security; and Pamela Bondi, U.S. Attorney General (collectively, "Respondents") in the above-referenced action. Respondents write to provide the Court with updated information regarding the location of Petitioner's detention.

In the Court's Corrected Order to Show Cause dated October 30, 2025, the Court ordered that "Petitioner shall not be transferred except to a facility within this District, the Southern District of New York, or the District of New Jersey absent further of the Court." ECF No. 9 at 2-3. As set forth in the Declaration of William Joyce dated November 4, 2025 (the "Declaration"), as of yesterday afternoon, Petitioner was housed in ICE's processing space at 26 Federal Plaza, New York, New York, pending the availability of bedspace for her at an ICE detention facility in the District of New Jersey. ECF 15 ¶¶ 10-13.

Yesterday evening, after the filing of the Declaration, ICE's Newark Field Office confirmed that a bedspace had been approved for Petitioner at the Elizabeth Contract Detention Facility in Elizabeth, New Jersey. Accordingly, Petitioner was transferred to the Elizabeth Contract Detention Facility at approximately 10:30 p.m. yesterday.

Thank you for the Court's time and consideration of this submission.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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