U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, New York 11201

December 12, 2025

BY ECF
Honorable Nina R. Morrison
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Y.G.B. v. Almodovar, et al.*, No. 25-cv-6244 (Morrison, J.)

Dear Judge Morrison:

This Office represents Respondents United States Immigration and Customs Enforcement ("ICE") Enforcement and Removal Operations New York City Acting Field Office Director Judith Almodovar, ICE Acting Director Todd Lyons, United States Secretary of Homeland Security Kristi Noem, United States Attorney General Pamela Bondi, and United States Department of Justice Executive Office for Immigration Review (collectively, "Respondents") in the above-referenced action. Respondents write jointly with Petitioner to supplement their status update filed on December 11, 2025 pursuant to the Court's December 4, 2025 Order. *See* ECF No. 25.

This afternoon, ICE advised this Office that it would be amenable to accommodating Petitioner's request that his ankle monitor be removed. ICE has advised that it is willing to instead utilize SmartLink monitoring via Petitioner's cell phone.

While the parties are still discussing the details of this proposal, Petitioners withdraw their prior objection to an adjournment of Defendants' deadline to file an opposition to Petitioner's Motion for Enforcement and Modification of the Court Order dated November 25, 2025.

Based on ICE's updated position on this issue, Petitioner now consents to an extension of time, to the end of the day on December 17, 2025, for Defendants to file their opposition brief.

Respondents maintain their request, set forth in the parties' December 11 letter, that that the parties have until December 22, 2025 to submit a joint status report—which will allow time for continued efforts to resolve Petitioner's motion—and that their briefing deadline be adjourned pending that status update.

The parties thank the Court for its time and consideration in this matter.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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