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November 18, 2025

VIA ECF
Hon. Joan M. Azrack
United States District Court for the Eastern District of New York
100 Federal Plaza,
Central Islip, New York 11722

Re: 25-06363—*Ulloa Montoya, Angel Maternidad v. Pamela Bondi, Attorney General, et al.*
Emergency Letter to Expedite TRO/§ 2241 Habeas

Dear Judge Azrack,

On November 17, 2025, counsel for the Petitioner, an 18-year-old who was previously designated as an unaccompanied alien child and is currently detained at the Brooklyn MDC for over 80 days, filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241, a motion for a Temporary Restraining Order, and supporting memoranda. We respectfully request that Your Honor issue the TRO and OSC forthwith and calendar the matter expeditiously to avoid imminent removal.

On November 10, 2025, DHS filed a motion to pretermit based on the Asylum Cooperative Agreement (ACA) rule. The Immigration Judge scheduled a new Master Calendar Hearing for December 2, 2025, to rule on DHS's motion. In light of DHS's litigation position and the accelerated EOIR schedule, Petitioner now faces a credible risk of imminent removal to a third country and continued adult jail confinement without the individualized, least-restrictive-setting (LRS) and alternatives-to-detention (ATD) determinations that Congress mandated for UAC age-outs, as well as without constitutionally adequate process.

Additionally, the Petitioner has an alternative form of relief available, further emphasizing the importance of maintaining the status quo and the need to resolve the questions before this Court expeditiously. On November 14, 2025, the Nassau County Family Court granted guardianship and issued the required SIJS Special Findings, with counsel overnighting Form I-360 to USCIS (USPS Tracking EI407432085US). Federal intervention is necessary to preserve the status quo and prevent irreparable harm.

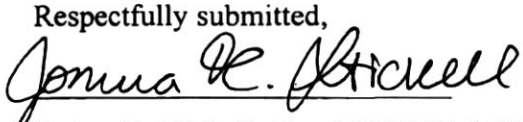
Expedited briefing will neither prejudice the Respondents nor impose undue burden. The agency's custody file and any age-out worksheets are readily accessible to the government, and the questions presented turn on statutory compliance and existing policies, not fact-intensive discovery. Any administrative burden is minimal compared to the irreparable harm to the Petitioner. A short deadline here preserves the status quo while the Court considers the merits. We

are filing this request simultaneously with a PDF of DHS's Motion to Pretermit (filed Nov. 10, 2025) and the Immigration Court's notice for a new Master Calendar Hearing scheduled for December 2, 2025.

For the foregoing reasons, the Petitioner respectfully requests this Court to (1) issue the proposed Order to Show Cause and set an expedited schedule, including the production of the complete age-out custody file (such as any Age-Out Review Worksheet and LRS/ATD analysis); (2) grant a temporary restraining order enjoining (a) removal and (b) transfer outside this District pending the OSC hearing; (3) order immediate release to Petitioner's previously approved ORR sponsor or his newly appointed guardian under conditions substantially similar to the sponsorship agreement; or, in the alternative, compel a written, individualized § 1232(c)(2)(B) LRS/ATD determination filed on the docket and a prompt neutral custody hearing that addresses ability to pay and non-custodial alternatives; or (4) alternatively, if the Court prefers to proceed on a short hearing schedule, enter an administrative stay of removal and transfer now and hear the TRO at the Court's earliest convenience.

Given the Petitioner's youth, the availability of an alternative form of relief under SIJS, the TVPRA's mandatory protections, and the tight EOIR timetable, we respectfully request that the Court issue the TRO and OSC forthwith.

Respectfully submitted,



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