UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E.M.M.,

Petitioner,

v.

Judith ALMODOVAR, Acting Director, New York City Field Office, U.S. Immigration and Customs Enforcement; Paul ARTETA, Director of the Orange County Correctional Facility; Teresa L. RILEY, Acting Chief Immigration Judge, Executive Office of Immigration Review; Daren K. MARGOLIN, Director, Executive Office of Immigration Review; Pamela BONDI, Attorney General of the United States; Kristi NOEM, Secretary of Homeland Security; and Todd M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement,

Respondents.

Case No. 1:25-cv-9592 (DEH)

NOTICE OF PETITIONER'S MOTION FOR ATTORNEY'S FEES

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 7(b) and Local Civil Rule 7.1, Petitioner moves this Court for attorneys' fees and costs incurred in successfully challenging his unconstitutional detention by Respondents pursuant to the Equal Access to Justice Act, 5 U.S.C. § 504, 28 U.S.C. § 2412. A supporting Memorandum of Law and declarations are filed herewith.

Dated: March 17, 2026
New York, NY

Respectfully submitted,

/s/ Natalie Maust

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