U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, New York 11201

November 21, 2025

By ECF
Honorable Brian M. Cogan
United States District Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singh v. Quarantillo et al.*, Civil Action No. 25-cv-6392 (Cogan, J.)

Dear Judge Cogan:

This Office represents the Respondents in this action. Respondents respectfully write to provide information concerning compliance with Your Honor's Order to Show Cause dated November 18, 2025 (the "OTSC") (Dkt. 8).

On November 18, 2025, Petitioner commenced this habeas action, which challenges his detention by the Department of Homeland Security ("DHS"). *See* Dkt. 1. Also on November 18, 2025, Your Honor issued the OTSC, which in relevant part prohibited Respondents from "relocating petitioner from this district pending resolution from of the petitioner". Dkt. 8 ¶ 1.

This afternoon, this Office learned from Petitioner's counsel that Immigration and Customs Enforcement ("ICE") had transferred Petitioner from this district to a facility in Elizabeth, New Jersey. This Office promptly notified ICE, which informed this Office that Petitioner had been inadvertently transferred to the Elizabeth facility this morning. ICE then began the process of arranging to transfer Petitioner to a facility in this district, the Metropolitan Detention Center ("MDC"). Because the MDC requires one day's notice before housing a detainee, which ICE provided today, and because the MDC does not accept new detainees on weekends, ICE will transfer Petitioner to the MDC this Monday, November 24. ICE will thereafter ensure that Petitioner will remain in this district for the duration of the pendency of this action. ICE and this Office apologize to the Court and to Petitioner for the inadvertent transfer of Petitioner to the Elizabeth facility. Furthermore, Respondents concede that this Court has jurisdiction over this action because Petitioner was detained in this district at the time that Petitioner commenced this action.

Earlier this evening, this Office spoke by telephone with Petitioner's counsel and explained to counsel that the transfer to the Elizabeth facility had been inadvertent; that ICE would transfer Petitioner to MDC on November 24; and that ICE could not do so sooner, for reasons set forth in the above paragraph. Petitioner's counsel graciously stated that he is satisfied with ICE's actions to rectify its error.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,
JOSEPH NOCELLA, JR.
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cc (by ECF):
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