December 5, 2025

BY ECF

Hon. Arun Subramanian
United State District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Tall v. Joyce, et al.*, No. 1:25-cv-09781-AS

Dear Judge Subramanian:

We hereby submit this joint letter on behalf of petitioner Abdou Tall ("Petitioner") and respondents William Joyce, in his official capacity as Acting Field Office Director of New York, U.S. Immigrations and Customs Enforcement; Kristi Noem, in her official capacity as Secretary, U.S. Department of Homeland Security; Todd Lyons, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; U.S. Department of Homeland Security; and U.S. Immigration and Customs Enforcement ("Respondents" and together with Petitioner, the "Parties") in the above-captioned case.

Pursuant to the Court's order on December 3, 2025, ECF 10, we advise Your Honor of the Parties' agreement and respectfully request the Court's approval of the following briefing schedule:

- Petitioner will file an amended petition for a writ of habeas corpus (the "Amended Petition") by December 5, 2025;
- Respondents will file any response to the Amended Petition by December 10, 2025; and
- Petitioner will file any reply by December 11, 2025.

The Parties are available during the following dates and times for a hearing on the Amended Petition:

- December 12, 2025, 9:30 a.m. to 1 p.m.
- December 15, 2025, 9:30 a.m. to 5:30 p.m.
- December 16, 2025, 12 p.m. to 5:30 p.m.

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We thank Your Honor for your consideration.

Respectfully submitted,

*/s/ Abena Mainoo*

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