



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*610 Federal Plaza
Central Islip, New York 11722
December 10, 2025*

By ECF

Honorable Nusrat Choudhury
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Minarcaja v. Lyons et al., 2:25-cv-6695 (NJC)

Dear Judge Choudhury:

Respondents respectfully submit the attached version of the Memorandum of Law in Response to the Court's Order to Show Cause Why Petitioner's Petition for Writ of Habeas Corpus Should Be Granted. The attached version is identical to the memorandum previously filed by Respondents with the exception of the inclusion of a Table of Authorities.

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

Respectfully submitted,

Joseph Nocella, Jr.
United States Attorney

By: /s/ Madeline O'Connor
Madeline O'Connor
Assistant U.S. Attorney
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cc: All counsel of record (by ECF)