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By ECF:

December 6, 2025

Honorable Ramon E. Reyes
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Luz Dary Hinestroza Arango v. Genalo, et al., No. 25-cv-6720 (RER).

Dear Judge Reyes,

Most respectfully request we ask that the Court forgive this late-night filing, but we wanted to bring to your attention a troubling development in this case.

Last Thursday at 4:52 PM, Your Honor issued an order restraining DHS from moving Ms. Arango out of New York and New Jersey. Ms. Arango's daughter just contacted our office hysterically crying, that her mother had been whisked away -without warning - to Arizona, in violation of this Court's order.

We most respectfully request that this Court order DHS to honor your ruling and re-transport her back immediately to this jurisdiction. We also further plead that the Court order her released by DHS at once.

We highlight that Ms. Arango is 63 years old, suffers from high blood pressure and has lived in the U.S. for no fewer than 26 years. She lives with her U.S. citizen daughter, Leslie Castro, in White Plains, NY who is sponsoring her for legal residency. Ms. Arango has worked for 16 years at an eyeglass factory, ABB Optical, where she is as a team leader, in Hawthorne in Westchester. *She was arrested during an USCIS interview in Bethpage, NY on Wednesday during an asylum interview*, for an application submitted 9 years ago. Ms. Arango is eminently qualified to adjust her status through her approved I-130 (Petition for Alien Relative) and her I-485 (Application to Adjust Status) currently pending. She is not a flight risk and much less, a danger to the community.

It is a repugnant violation of her Fifth Amendment due process rights, that USCIS - working in tandem with ICE – surreptitiously and cruelly summoned her to attend an asylum interview, in an illegal "bait and switch operation," only to incarcerate her with the intention that she "self-deport" after 26 years here. We beg the Court to free Ms. Arango, so that she can complete her imminent adjustment of status, which she is legally entitled to do, as have millions, if not hundreds of thousands, of immigrants before her.

Respectfully submitted,

/s/ S. Michael Musa-Obregon
S. Michael Musa-Obregon, Esq.