U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, NY 11201

December 8, 2025

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

Re: *Arango v. Genalo*, No. 25-cv-6720 (RER)

Dear Judge Reyes:

This Office represents Respondents in the above-referenced habeas action. Your Honor issued an Order dated December 5, 2025 at shortly before 5:00p.m. that, *inter alia*, directed Immigration and Customs Enforcement (ICE) not to move Petitioner outside this District, the Southern District of New York, or the District of New Jersey. A further Order this morning directed a status report on Petitioner's location, which was limited to certain districts, in the December 5 Order. This letter is respectfully submitted to provide that status update.

This Office did convey the order to ICE the 5pm December 5 Order at 5:09 pm, and again at 5:45 p.m. on Friday, and again at 5:51 p.m. This Office has been informed by ICE that ICE did document that Order in its database.

ICE has advised that Petitioner was located within this district at the time this suit was filed, which means the jurisdiction under this Court is proper regardless of whether Petitioner was thereafter moved. *See Khalil v. Joyce,* 771 F. Supp. 3d 268, 273 (S.D.N.Y. 2025). This Office has been further advised this afternoon that Petitioner was moved to the District of New Jersey and from there, eventually to a detention of facility in Louisiana.

ICE has further advised this Office this afternoon, that Petitioner was inadvertently transferred outside the districts referenced in the 5pm December 5 Order.

ICE advises that it is working to transfer Petitioner back to New York tomorrow, but there is a bond hearing scheduled tomorrow, at 1:30p.m., a virtual hearing as all such are, in New York Immigration Court on Varick Street, in Manhattan, New York, and transfer is likely to impede that hearing going forward if Petitioner is in transit.

In an effort to hold that bond hearing as soon as possible, as it may resolve this action, this Office spoke to Petitioner's counsel and asked if the transfer back to New York should wait on the bond hearing scheduled for tomorrow. Petitioner's counsel advised that he preferred instead to have the transfer back to New York happen first. Accordingly, that is ICE's intention. This Office will file a further status report.

Thank you for the Court's time and attention to this request.

Respectfully submitted,

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