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By ECF

December 17, 2025

Honorable Sanket J. Bulsara
United States District Judge
Eastern District of New York
Central Islip, NY

Re: 2:25-cv-06905-SJB Tenezaca Pucha v. Genalo (habeas corpus)

Dear Judge Bulsara:

Yesterday, the Court requested that the Respondents the explain the conditions of the persons being detained at the ICE holding facility in Central Islip. NY.

To the extent the Court wants to hear from Mr. Pucha, he is available to testify later today regarding the same. Specifically, he reported to me today that in his ICE holding pen at Central Islip there were two deteriorated thin mats used ostensibly to sleep, sometimes by up to 10 detainees at a time (who had to take turns using the mats). Many had to stand up in the in room because there was not enough floor space room for all of them to lay down at the same time. The was one chair for the group in that room as well. The lights could not be turned off, they drank water from the small sink in that room, the food was drastically substandard even by prison standards and the room was always surveilled by video.

I also have a certified declaration by another recent detainee at that facility, Mrs. Luz Dary Hinestroza Arango who I also represent, who has very pertinent information for the Court's inquiry. She is available to share this information with the Court. I attach herein her affidavit to the extent it may be useful for the Court's inquiry. Since she was just released two days ago on a habeas writ in this district, she must return today to Central Islip to retrieve her belongings. She is traveling with me to the building, and she is available to testify live as well today at 4:00 PM.

Respectfully submitted,

S. Michael Musa-Obregon, Esq.,
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