U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

December 18, 2025

Honorable Sanket J. Bulsara
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Pucha v. Genalo, et al.*, No. 25-CV-6905 (Bulsara, J.)

Dear Judge Bulsara:

Respondents Todd Lyons, Kristi Noem, and Pamela Bondi respectfully submit this letter in further response to this Court's December 16, 2025 Minute Entry and Order directing that Respondents provide to the Court photographs of the hold room where Petitioner was detained at the Immigration and Customs Enforcement ("ICE") Hold Room "CIHR". ICE has now taken photographs of the CIHR. With leave of the Court, Respondents request that they be permitted to submit the photographs under seal for *in camera* review by Your Honor. The Respondents respectfully make this request because of the security and operational concerns set forth in the Declaration of Supervisory Detention Officer Petito, Docket No. 13, at ¶¶ 30-32.

This Office thanks the Court for its consideration in this matter.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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