

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

M.S., a minor by his Next Friend, C.S., : CIVIL NO. 3:25-CV-____
Petitioner,

v. :

ANGIE SALAZAR, ET AL. : DECEMBER 30, 2025
Respondents.

PETITIONER'S EMERGENCY MOTION FOR EXPEDITED STATUS CONFERENCE

In light of the ongoing unlawful detention of the Petitioner, a thirteen-year-old minor, Petitioner respectfully files this emergency motion for an expedited status conference and seeks expedited emergency relief in this case. Petitioner anticipates filing a Motion for a Temporary Restraining Order and Preliminary Injunction as soon as possible, but the expeditious release of J.A.L.L. in the related case of *J.A.L.L., a minor by his Next Friend L.A.L.L., v. Wesling, et al.*, 3:25-cv-2125 (VDO)(See Notice of Release of Petitioner, ECF Doc. #18) requires that this case be treated as an emergency and be given expedited treatment. The same relief should be afforded to this Petitioner.

Petitioner has been in custody of the Respondents, Office of Refugee Resettlement, ("ORR") for 459 days as of the date of this filing, more than one year and three months. There is no legitimate government purpose in keeping this child Petitioner in detention in long-term foster care in Connecticut, when ORR has approved his Next Friend, C.S. to sponsor his two sisters. In fact, ORR, on April 1, 2025, released Petitioner's two sisters to C.S. who resides in Ft. Lauderdale, Florida. It is unconscionable that Respondents have left Petitioner even more isolated for the last nine months without his two sisters, with whom he has lived his entire life. Accordingly, this Court should immediately schedule on an emergency basis a status conference in this matter.

Respectfully submitted,

PETITIONER
M.S., by his Next Friend C.S.

/s/ Steven R. Strom
Steven R. Strom
Fed Bar No. ct01211
151 Livingston St.
New Haven, CT 06511
Tel: 203-804-3683
Email: strom@snet.net

Attorney for Petitioner, M.S.

CERTIFICATION

I hereby certify that on December 30, 2025, a copy of the foregoing Emergency Motion for Expedited Status Conference was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

A copy of the foregoing Petition for a was also hand-delivered and emailed to the following:

Michelle L. McConaghy, ct27157
Assistant United States Attorney
United States Attorney's Office
District of Connecticut
157 Church Street, 24th Floor
New Haven, CT 06510

Email: michelle.mcconaghy@usdoj.gov

/s/ Steven R. Strom
Steven R. Strom
Attorney for Petitioner, M.S.