

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

M.S., a minor by his Next Friend, C.S., : CIVIL NO. 3:25-CV-2170-(VDO)
Petitioner,

v. :

ANGIE SALAZAR, ET AL. : JANUARY 19, 2026
Respondents.

PETITIONER'S STATUS REPORT

Pursuant to this Court's Order setting a telephonic Status Conference to be held on January 20, 2026, (ECF No. 36) Petitioner respectfully submits this status report to inform the Court of the progress of this case and to address two questions posed in the Court's Order. The Court has directed that the "parties shall also come prepared to apprise the Court of the status of any pending sponsorship applications of any adult seeking sponsorship of M.S., and the status of any related proceedings in Connecticut state court." The Petitioner respectfully represents the following:

1. Sponsorship Applications – There are no pending sponsorship applications at this time.
2. Status of Any Related Proceedings in State Court

Before reporting the status of any related proceedings in state court, Petitioner must emphasize that ORR never raised any concern with the potential sponsors, both D.S. and C.S., nor to Attorney Reagan, nor to Attorney Burns, from September 2024 to November 2025, about a paternity adjudication, nor were they advised to address paternity at any point. The unconscionable delays that occurred in this case were not for lack of effort on the part of D.S. and C.S. who continued to comply with a repeated and endless series of document demands from ORR to them as potential sponsors. All the while they were being kept in the dark. Importantly, neither D.S nor C.S, nor their attorneys, had any reason to

think that the reason Petitioner was not being released to them was for lack of a paternity adjudication. ORR never said that. Instead, ORR repeatedly held out that if the potential sponsors, D.S., and then C.S. got the requested documents (e.g. ID for sister N.F.S., updated proof of address, updated income, etc.), and submitted them to ORR, the Petitioner would be released to them.

As to the state court action, Petitioner's family has contracted with a legal services organization in Connecticut to bring a paternity complaint under the Connecticut Parentage Act. However, no action has yet been filed. Undersigned counsel has been informed that the attorney working on that case is in process of preparing the case and intends to file in the coming weeks, hopefully some time in February 2026, but not likely before the hearing on the Motion for TRO and Preliminary Injunction on February 5, 2026. It would be pure speculation to attempt to provide an exact estimate as to how long the case may take to be adjudicated.

3. Other Miscellaneous Matters

a. Service of the Summons and Complaint – On January 6, 2026, the Clerk issued the summonses in this matter. On January 7, 2026, both the U.S. Attorney's Office in New Haven, and Randi Cavallaro at CCP were served with a hand-delivered copy of the Summons and Complaint/Petition. Certified mailings were sent to Respondents, Salazar, Adams, and Kennedy, as well as the U.S. Attorney General, by USPS with green cards, certified mail, return receipt requested. The green card receipts have not yet been returned. However, USPS tracking numbers and printouts reflect each of the four mailings with the Summons and Complaint/Petition was delivered. Petitioner's counsel filed an Affidavit of Service, attached those printouts confirming delivery, with copies of the green cards. See ECF No. 49

b. Counsel Has Appeared for CCP – On January 15, 2026, undersigned counsel for Petitioner had an introductory phone call with Attorney Chris Folsom, who has appeared for Respondent Randi Cavallaro. Petitioner's counsel, undersigned below was able to confirm that all of the documents, and all of the pending motions and exhibits, that had been provided to Respondent Cavallaro and CCP corporate

counsel, Attorney Langerman, have been received by Attorney Folsom. Of course, Attorney Folsom asked for more time to get familiar with the case, and the filings, and undersigned consented to his request for an extension of time. In addition, undersigned counsel offered to send whatever documents Attorney Folsom may not have, for example, the unredacted sealed exhibits, to Attorney Folsom.

c. Testimony at the February 5 Hearing – Petitioner is agreeable to proceed at the hearing with both parties waiving their respective cross-examinations, and have the Court conduct any questioning. Petitioner agrees to have his Declarants available for questioning by the Court, except for M.S. and C.S. (for reasons that can be explained at the Status Conference). Specifically, Petitioner anticipates that Attorney Reagan, Dr. Lopez, Attorney Burns, and the Child Advocate from the Young Center, Attorney Canales, and Prof. McAlister will be in attendance. Petitioner expects to provide the additional declarations from Attorney Burns and Prof. McAlister as soon as they are completed, but no later than January 30, 2026. Petitioner respectfully requests to know whether witnesses who have provided sworn Declarations in this matter need to appear in person, or if they can be available for any questions the Court may have by way of Zoom teleconferencing, (for example Attorney Burns who works in Pennsylvania), and if they can provide remote video testimony into the Courtroom.

Respectfully submitted,

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

/s/ Steven R. Strom
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CERTIFICATION

I hereby certify that on this date, January 19, 2026, a copy of the foregoing was sent by e-mail to all parties who have an appearance and an email on file on the PACER docket of this case. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

By: Steven R. Strom
Steven R. Strom
Attorney for Petitioner