



U.S. Department of Justice

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January 29, 2026

VIA ECF

The Honorable Jeffrey M. Bryan
United States District Judge
316 North Robert Street
St. Paul, MN 55101

Re: *Romero Masi cv. Bondi et al.*, No. 26-cv-00605-JMB-DJF

Dear Judge Bryan,

I write regarding the order entered yesterday in this case at Dkt. 7; in particular, the portion of the order requiring the Federal Respondents to provide a status update by 11:00 am on January 29, 2026, affirming that Petitioner was released in accordance with the Court's order. I regret that I am unable to affirm that Petitioner has been released.

As of my last communication with ICE personnel at 1313, my understanding is that Petitioner is currently located in El Paso, Texas. In that communication, I instructed the Agency to return Petitioner immediately to Minnesota. For the Court's information—and being careful to avoid disclosing the substance of any attorney-client communications—I can provide the timeline below of my efforts to secure ICE's compliance with the Court's order:

- I was assigned to this case at 1156 on January 25, 2026. I reviewed the petition and prepared a response to it, in light of the 1100 on January 2026 deadline for the Federal Respondents' response.
- On Tuesday, January 27, 2026 at 1140, I learned that Petitioner had been transferred to Texas on January 24, 2026. At 1213, I contacted agency counsel on this matter.
- At 2046 on January 27, 2026, I communicated to the Agency the Court issued an order granting Petitioner's habeas petition, I forwarded the order to ICE.
- At 1234 on January 29, 2026, I requested an update on this matter from the Agency.
- At 1450, the undersigned counsel had a call with the Agency to confirm return of this petitioner as soon as possible. The Agency confirmed it will comply with order.

- At 1454, the Agency sent an email confirming it will search for flights to return this Petitioner back to Minnesota.

I will promptly communicate any additional information I receive about this issue to the Court and to Petitioner's counsel. And if instructed to do so, I will file a notice once I receive confirmation that Petitioner has been returned to Minnesota and released.

Sincerely,

DANIEL N. ROSEN
United States Attorney

s/ J. Cruz Rodriguez

BY: J. Cruz Rodriguez
Assistant United States Attorney