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By ECF
Hon. Jeanette A. Vargas
United States District Juge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *L.S.M. v. Genalo, et al.*, No. 26 Civ. 942 (JAV)

Dear Judge Vargas:

This firm and Brooklyn Defender Services represents the Petitioner in the above-referenced habeas corpus matter. Earlier this evening the Court issued an order granting the petition and ordering the Petitioner's release. (ECF No. 10).

We respectfully request that the Court clarify its order to specifically direct that the Respondents release the Petitioner from custody without electronic monitoring (such as an ankle bracelet), reporting requirements, or other additional restraints on his liberty, as requested in the Petitioner's Prayer for Relief. (ECF No. 1 at 29).

Where, as here, "ICE had no legal basis to detain [the Petitioner], they have no legal basis to add restrictions to his release." *Garcia Sandoval v. Rokosky*, No. 25-cv-17229, ECF No. 13 (D.N.J. December 2, 2025)(ordering that the petitioner be removed from ISAP and any accompanying restrictions within 48 hours"); *Campbell v. Almodovar*, No. 1 , 25-cv-09509 (JLR), 2025 WL 3626099, at *1 (clarifying that the Government could not impose "any form of re-detention – including electronic monitoring and mandatory reporting").

Respectfully submitted,

/s/ William E. Craco

William E. Craco