UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

L.S.M.

Petitioner,

v.

Kenneth GENALO, New York Field Office Director for U.S. Immigration and Customs Enforcement; Paul ARTETA, Warden of Orange County Correctional Facility; Pamela BONDI, Attorney General of the United States; Kristi NOEM, Secretary of Homeland Security; and Todd M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement,

Respondents.

Civil Action No. 26-CV-00942 (JAV)

PETITIONER'S NOTICE OF MOTION FOR FEES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT

Petitioner L.S.M. respectfully requests that this Court award attorneys' fees pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412(b), following a successful challenge to his unlawful immigration detention pursuant to 8 U.S.C. § 1225(b)(2). Petitioner meets all the requirements under the EAJA for an award of attorneys' fees, including that: (1) his motion is timely; (2) he is the prevailing party; (3) Respondents cannot meet their burden to show the Government's position was substantially justified; (4) there are no special circumstances that would make an award unjust; and, (5) Petitioner's fees are reasonable and well-documented. Therefore, this Court should grant Petitioner's attorneys' fees in the amount of $13,946.63. 8 U.S.C. § 2412(d).

Date: March 9, 2026

Respectfully submitted,

By: */s/ Mia N. Gonzalez*

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