U.S. Department of Justice

United States Attorney
Eastern District of New York

271-A Cadman Plaza East
Brooklyn, New York 11201

March 4, 2026

By ECF

Honorable Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Martinez de la Cruz v. Russo et al.,* Civil Action No. 26-629 (HG)

Dear Judge Gonzalez:

This Office represents Respondents Director Francis Russo in his official capacity as Director of Field Operations for U.S. Customs and Border Protection, New York Field Office; Judith Almodovar, in her official capacity as Acting Field Office Director, New York City Field office, U.S. Immigration and Customs Enforcement ("ICE"); Kristi Noem, in her official capacity as Secretary, U.S. Department of Homeland Security; and Pamela Bondi, in her capacity as United States Attorney General (collectively, "Respondents").

Respondents write to inform the Court that ICE released Petitioner from the 26 Federal Plaza facility on February 27, 2026; Petitioner's counsel has confirmed the release. After conferring with counsel for Petitioner, the parties (1) report that they are discussing whether there are any additional issues to be resolved in this action; (2) propose that the Court direct them to, by March 18, 2026, either file a stipulation resolving this action or a status report; and (3) respectfully request that the Court vacate all other deadlines in this action.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

JOSEPH NOCELLA
United States Attorney
Attorney for Respondents

By: /s/ Elliot M. Schachner

Elliot M. Schachner
Assistant U.S. Attorney
(718) 254-6053

cc: Counsel of Record (by ECF)