UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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Parada Cruz

v.

Noem et al.
----------x

REPLY TO DOJ RESPONSE

Civil Action No. 2:26-cv-01112

(Choudhury, J.)

Our office has reviewed the government's letter and accompanying exhibits. We have also conferred with opposing counsel. In this regard, we agree that a hearing is not necessary and we do not object to this Court deciding the petitions on the papers in lieu of a hearing.

Thank you for the Court's time and attention to this matter.

Dated: February 27, 2026
Queens, New York

By: /s/ Johnathan S. Kraidman

Johnathan S. Kraidman
Law Office of Perham Makabi
Counsel for Plaintiff
8015 Lefferts Boulevard
Suite 1R
Kew Gardens, NY 11415
718-208-3098
Email: jk@makabilaw.com