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March 11, 2026

By ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: J.R.R. v. Genalo, et al., No. 26-cv-1245 (PKC)

Dear Judge Chen:

I represent Petitioner J.R.R. in the above-captioned habeas proceeding. Petitioner filed the Emergency Petition for Writ of Habeas Corpus on March 3, 2026. ECF No. 1 (“Petition”). Pursuant to the Court’s Order to Show Cause, *see* ECF No. 6, Respondents filed their Response on March 10, 2026, *see* ECF No. 9 (“Response”). In the Response, Respondents acknowledge that the Court’s prior decisions in *R.A.R.R. v. Almodovar*, No. 25-cv-6597 (PKC), 2026 WL 323040 (E.D.N.Y. Feb. 6, 2026), and *Yin v. Maldonado*, No. 26-cv-103 (PKC), 2026 WL 295389 (E.D.N.Y. Feb. 4, 2026), would control the result in this case if the Court adheres to those decisions. Response at 4.

Given that Respondents acknowledge that *R.A.R.R.* and *Yin* control the outcome of this case and Petitioner agrees, Petitioner respectfully requests that the Court order J.R.R. immediately released just as the Court did in both those cases. *See R.A.R.R.*, 2026 WL 323040, at *1; *Yin*, 2026 WL 295389, at *1; *see also Galeas Miranda v. Maldonado*, No. 25-cv-6882 (PKC), 2026 WL 25405, at *1 (E.D.N.Y. Jan. 5, 2026) (adhering to *R.A.R.R.* and ordering immediate release).

Petitioner additionally requests that Respondents be ordered to release him “subject to the conditions at which he was at liberty before he was detained.” Petition, Prayer for Relief ¶ 3. Prior to his recent detention by Respondents, Petitioner was free from detention without any constraints on his liberty imposed by immigration authorities—that is, he was not subject to any electronic monitoring by Immigration and Customs Enforcement (“ICE”) or any required in-person or phone check-ins with ICE or its Intensive Supervision Appearance Program. Petitioner respectfully requests that he be ordered returned to this status such that Respondents are prohibited from imposing any additional constraints on his liberty upon his release from his current detention under the Court’s order. *See, e.g., F.H.H. v. Genalo*, No. 26-cv-525 (HG), 2026 WL 323174, at *4 (E.D.N.Y. Feb. 6, 2026) (“For the avoidance of doubt, the Court concludes that Petitioner ‘is entitled to release from the unlawful restrictions on his liberty—which means, in the circumstances here, restoration of . . . the status quo ante.’” (quoting *Khabazha v. United States Immigr. &*

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Customs Enf't, No. 25-cv-5279, 2025 WL 3281514, at *8 (S.D.N.Y. Nov. 25, 2025)). Respondents do not address this aspect of Petitioner's request in their Response.¹

Lastly, Petitioner seeks to update the Court and clarify certain facts in the Petition. *First*, the Petition stated that J.R.R. was waiting for his priority date to file his lawful permanent resident application with U.S. Citizenship and Immigration Services ("USCIS"). *See* Petition ¶ 25. In fact, J.R.R.'s priority date is current, so he is eligible to and intends to promptly submit his lawful permanent resident application. *Second*, USCIS issued J.R.R. a termination notice for the deferred action based on his Special Immigrant Juvenile Status in a letter dated March 3, 2026—the day he was detained by Respondents. This letter was received by J.R.R.'s partner by mail at their home on or around March 9, 2026, and by J.R.R.'s immigration counsel by mail on or around March 10, 2026.

In sum, given that Respondents acknowledge that Your Honor's prior cases control the outcome of this case, Petitioner respectfully requests that the Court order Petitioner immediately released and returned to the status of liberty he enjoyed prior to his recent detention

I thank the Court for its consideration of this letter.

Respectfully submitted,

/s/ Lucas Marquez

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cc: Counsel of Record (by ECF)

¹ To the extent the Court would like supplemental briefing on this issue, Petitioner respectfully requests that the Court order him immediately released pending any supplemental briefing and decision on whether additional constraints on his liberty connected to his release from his current detention are lawful considering Respondents' due process violation upon detaining Petitioner on March 3, 2026.