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March 12, 2026

BY ECF

Honorable Ramon E. Reyes, Jr.
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Salas Martinez v. Maldonado, et al.*, No. 26-cv-1342 (Reyes, J.)

Dear Judge Reyes:

This Office represents the Petitioner in this habeas action, and writes in response to Respondents' Letter, ECF No. 5.

As acknowledged by Respondents, Your Honor's decision in *Chander v. Maldonado*, No. 26-cv-0021, ECF Nos. 9-10 ("*Chander*"), controls the outcome of this matter, both with respect to the merits (8 U.S.C. § 1226(a) is the applicable statute), and the appropriate remedy (immediate release). Respondents offer no persuasive argument to the contrary.

Because *Chander* controls, which again, Respondents explicitly acknowledge (*see* ECF No. 5, at 4: "[w]hile Respondents respectfully disagree with the Court's ruling in *Chander*, Respondents acknowledge that this case would be decided in Petitioner's favor if the Court adheres its reasoning in *Chander*"), Petitioner hopes for a quick resolution of this matter, and also respectfully asks the Court to reconsider the need for the hearing presently scheduled for March 16, 2026.

Respectfully submitted,

/s/ Michael Goldman
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