U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

March 10, 2026

VIA ECF

Honorable Nusrat J. Choudhury
United States District Court Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Juan Pablo Castano Rendon v. Bondi, et al.*
No. 26-cv-1361 (Choudhury, J.)

Dear Judge Choudhury:

This Office represents Respondents in the above-referenced action, in which Petitioner Juan Pablo Castano Rendon ("Petitioner") filed a Petition for a writ of habeas corpus on March 9, 2026 challenging his detention by Immigration and Customs Enforcement ("ICE). *See* ECF Dkt. # 1. Respondents respectfully submit this letter pursuant to the Stay of Removal and Order to Show Cause entered on March 10, 2026 (ECF Dkt. # 3) (the "Order"), and the Electronic Order entered earlier today, March 11, 2026, which partially granted Respondents' request for an extension of time to complete their response.

Pursuant to the March 9, 2026 Order, Respondents herewith submit the Declaration of Patrick Heerey, a Deportation Officer with ICE ("DO Heerey"), dated March 11, 2026. DO Heerey was one of the officers who effected Petitioner's arrest on March 9, 2026. *See* Heery Decl. In the hours since Respondents filed their Combined Partial Response to March 10, 2026 Order and Request for Additional Time to Submit Complete Response, filed on March 10, 2026 (ECF Dkt. # 5) ("Combined Partial Response and Request for Additional Time"), ICE has not received any additional relevant documents pertaining to Petitioner's prior removal proceedings. *See* Respondents' Combined Partial Response and Request for Additional Time at p. 2. Accordingly, the documents attached to the Heery Declaration as Exhibits A-G are the same documents submitted as Exhibits A-C to Respondents' Combined Partial Response and Request for Additional Time.

As previously noted, the statutory basis for detaining Petitioner is 8 U.S.C. § 1225(b)(2)(A). *See* Respondents' Combined Partial Response and Request for Additional Time; *see also* Heerey Declaration. As Petitioner was detained pursuant to 8 U.S.C. § 1225(b)(2)(A), which provides for mandatory detention, ICE did not make any custody determination with respect to Petitioner.

As set forth in Respondents' Combined Partial Response and Request for Additional Time, the issues presented in this action are substantially similar to those presented in *Rodriguez-Acurio v. Almodovar*, No. 25-cv-6065, 2025 WL 3314420 (E.D.N.Y. Nov. 28, 2025).

The legal issues presented in the Petition concern the statutory authority for ICE's detention of Petitioner and whether his detention violates his due process protections. Petition, ¶¶ 39-49. Petitioner principally seeks an order from this Court directing ICE to release him from detention. *Id.*, Page 12 ("Prayer for Relief").

Respondents submit that a hearing is not necessary and the writ may be decided on the submissions.

Respondents thank the Court for its consideration of this submission.

Respectfully submitted,

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