U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

March 11, 2026

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

Re: *Giovanni Ilma Zapata v. Genalo, et. al.*
No. 26-CV-01365 (Choudhury, J.)

Dear Judge Choudhury:

This Office represents the Respondents in the above-captioned case in which Petitioner Giovanni Jesus Ilma-Zapata ("Petitioner") filed a petition for a writ of habeas corpus on March 9, 2026 challenging his detention by Immigration and Customs Enforcement ("ICE"). *See* Docket Entry ("DE") No. 1. Respondents respectfully submit this letter pursuant Your Honor's Order to provide additional responses and documents by March 11, 2026 at 12:00 p.m.

Respondents respectfully submit the attached Declaration from Deportation Officer William Kennedy, III to provide the Court with Petitioner's immigration history. At this time, the officer who arrested Petitioner on March 9, 2026 is unavailable to review and execute his draft declaration regarding the arrest and provide supporting documentation, such as the I-200 Warrant for Arrest of Alien. Once the officer is available, Respondents intend to file his executed declaration and provide the outstanding records, such as the I-200, that the Court will find material to the resolution of this action as it has requested. As Respondents stated in its prior filings, they have no objection to the Court deciding this matter on the papers based on its prior precedent and documents/information that is or is not currently before the Court.

Thank you for the consideration of this submission.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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