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REPLY TO WHITE PLAINS

By ECF

March 18, 2026

The Honorable Gary Brown, U.S.D.J.
United States District Court
Eastern District of New York
Central Islip, NY

Re: *Castro Espinoza v. Bondi, No. 26-cv-1516*

Dear Judge Brown:

For today's habeas hearing, we respectfully present the following bond package to the court.

We propose that Petitioner be released on a $5000 bond (subject to the Court's amount modification, of course) signed by his aunt, Ms. Ana Lucias Espinoza Espinoza, who is a United States Citizen and a New York resident of Ridgewood, Queens.

She is currently in transit, driving back to New York after attending her daughter's Army graduation ceremony in Oklahoma, and will appear virtually today. As a testament to the faith she places in her nephew's seriousness in this case, she was ready to interrupt her visit with her child at the Army facility and fly in to New York yesterday to be in court today, but thanks to the Court's kind consideration, she did not have to do that.

We have attached copies of her U.S. passport, driver's license, proof of income, and income taxes. She is paid via electronic payments. Her salary is approximately $40,000 a year, and she works as a cashier at Food Bazaar in Manhattan Avenue, Brooklyn, New York.

We've also attached letters from several community members who know the petitioner and who attest to his good moral character and lack of dangerousness. We have also attached a letter from the [redacted]

[redacted]

Petitioner takes this case extremely seriously and is deeply grateful that Your Honor is considering his release. He would be attentive to the utmost degree to all of the conditions the Court might impose. If released, we expect he will comply with all the conditions of release.

Sincerely,

/s/ S. Michael Musa-Obregón
S. Michael Musa-Obregón
Counsel for Petitioner