UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOSTIN NAHUM BLANDON,

Petitioner,

v.

RAUL MALDONADO, JR., Warden, Metropolitan Detention Center; JUDITH ALMODOVAR, New York Field Office Director for U.S. Immigration and Customs Enforcement; TODD BLANCHE, Acting Attorney General of the United States; MARKWAYNE MULLIN, Secretary of Homeland Security; and TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement,

Respondents.

NOTICE OF MOTION TO DISMISS REQUEST TO COMPEL RESPONDENTS TO RESTORE THE GRANT OF DEFERRED ACTION PREVIOUSLY ISSUED TO PETITIONER

Civil Action No.
26-cv-1669
(Choudhury, J.)

PLEASE TAKE NOTICE that that on the enclosed Memorandum of Law, Respondents Raul Maldonado, Jr., in his official capacity as Warden of the Metropolitan Detention Center ("MDC"); Judith Almodovar, in her official capacity as New York Field Office Director for U.S. Immigration and Customs Enforcement ("ICE"); Todd Blanche, in his official capacity as Acting Attorney General of the United States; Markwayne Mullin, in his official capacity as Secretary of the Department of Homeland Security ("DHS"); and Todd M. Lyons, in his official capacity as Acting Director of ICE (collectively, "Respondents"), by their attorney, JOSEPH NOCELLA, JR., United States Attorney for the Eastern District of New York, MARY M. DICKMAN, Assistant United States Attorney, of counsel, will move this Honorable Court, before the Honorable Nusrat J. Choudhury, at the United States Federal Courthouse, Eastern District of New York, 610 Federal Plaza, Central Islip, New York 11722, on a date to be set by this Court, for an Order granting a motion to dismiss Petitioner's Request to Compel Respondents to Restore the

Grant of Deferred Action Previously Issued to Petitioner, pursuant to Fed. R. Civ. P. 12(b)(1) and for such other and further relief as the Court deems appropriate.

Dated: Central Islip, New York
April 8, 2026

JOSEPH NOCELLA, JR.
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Counsel for Plaintiffs