U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 23, 2026

By ECF
The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Maykel Ayol Vimos v. Sanchez, et al.*, No. 26 Civ. 2306 (LJL)

Dear Judge Liman:

This Office represents the government in the above-referenced habeas corpus action brought on behalf of the petitioner by next friend Maria Edelina Vimos Rivera. On March 20, 2026, the Court issued an order directing the government to file a letter providing certain information by 1:00 p.m. today. Dkt. No. 5. I write respectfully to provide that response.

a. whether Petitioner was . . . located in the Southern District of New York at the time that the Petition was filed . . . . ;

Yes, Petitioner was located within the Southern District of New York at the time the petition was filed, and therefore venue is not in dispute.

b. Petitioner's A-number, current place of detention, and a contact person who can facilitate prospective counsel's access to Petitioner;

Petitioner's A-number is [redacted]. Petitioner, a minor, is in the custody of the U.S. Department of Health and Human Services' Office of Refugee Resettlement ("ORR"), and he is currently in the care of ORR at the Cayuga Centers located at 1916 Park Avenue, New York, New York. Field Program Specialists Yadira Taipan and Mariana Valdez can facilitate counsel's access to Petitioner, and I understand that their contact information has been or will be provided to counsel directly.

c. the basis for Petitioner's detention;

Petitioner, an eleven-year-old from Ecuador, unlawfully entered the United States in November 2025, having been brought to the U.S. by someone other than his parents. U.S. Customs and Border Protection apprehended Petitioner and other children related to his family-unit (three of whom have also filed habeas petitions in this Court); he was determined to be an Unaccompanied Alien Child (UAC) as described in 6 U.S.C. § 279, and placed in ORR care pursuant to the Trafficking Victims Protection Reauthorization Act (TVPRA), 8 U.S.C § 1232. Petitioner remains in the care of ORR at Cayuga Centers pending his placement with a sponsor.

d. Whether Respondents consent to issuance of the writ;

No, Respondents do not consent to issuance of the writ. Respondents intend to submit a response to the petition.

* * *

I thank the Court for its consideration of this submission.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: *s/ Tudor M. Neagu*
TUDOR M. NEAGU
Special Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Telephone: (646) 906-5441
E-mail: tudor.neagu@usdoj.gov
Attorney for Respondents

cc: Counsel of Record (by ECF)