U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 24, 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: *M.A.V. ex rel. Maria Edelina Vimos Rivera v. Sanchez, et al.*,
No. 26 Civ. 2306 (LJL)

Dear Judge Liman:

This Office represents the government in the above-referenced habeas corpus action. I write respectfully in advance of tomorrow's conference for two reasons. First, to submit the attached Declaration of Assistant Deputy Director for Policy for the Unaccompanied Alien Children Bureau Toby Biswas. Second, to respond to the Court's March 24, 2026 Order, confirming that the issues and arguments presented in Respondents' memorandum of law in No. 26 Civ. 2276 (JPO), as well as the related cases of No. 26 Civ. 2299 (VSB) and No. 26 Civ. 2258 (MKV), are the same as in this case. I also note that Judge Broderick and Judge Oetken requested status updates in the aforementioned cases by this Friday, March 27, 2026.

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I thank the Court for its consideration of this submission.

Respectfully submitted,

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

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cc: Counsel of Record (by ECF)