U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

April 10, 2026

Honorable Gary R. Brown
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Jose Maria Cajbon Chiac v. Genalo, et.al.* 26-cv-2128 (Brown, J.)

Dear Judge Brown:

This Office represents Respondents in the above captioned habeas petition filed by Petitioner Jose Maria Cajbon Chiac ("Petitioner"). Docket Entry ("DE") #1.

This letter is respectfully submitted to request, with the consent of counsel for Petitioner, until Monday, April 13, 2023 to respond to Your Honor's Standing Order dated April 10, 2026. Respondents believe Petitioner has been assigned A # [redacted] and that Petitioner is currently detained at the Port Isabel Detention Center in Texas. Pursuant to Your Honor's supplemental order, the undersigned provided this information to Petitioner's counsel who indicated that the A# belongs to someone with a different last name. Counsel for Petitioner also indicated that she has arranged a phone call with the detainee with that A number for tomorrow afternoon.

Under these circumstances, Respondents, with the consent of Petitioner's counsel, request until Monday, April 13 to respond to the Court's standing order and determine if Petitioner was located in Texas at the time of the filing of the petition, and if this Court has jurisdiction over the petition.

Thank you for the consideration if this request.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/ Diane C. Leonardo
Diane C. Leonardo
Assistant U.S. Attorney
(631) 715-7854