U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

May 19, 2026

Honorable Nusrat J. Choudhury
United States District Court Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Sunilkumar Gandabhai Patel v. Maldonado, et al.*
No. 26-cv-2622 (Choudhury, J.)

Dear Judge Choudhury:

This Office represents Respondents in the above-referenced action, in which Petitioner Sunilkumar Gandabhai Patel ("Petitioner") petitioned the Court for a writ of habeas corpus, challenging his detention by Immigration and Customs Enforcement ("ICE"). Respondents write to inform the Court of their efforts to comply with the Electronic Order entered at 6:16 p.m. this evening (the "May 19, 2026 Order") that provisionally granted Petitioner's application, in part, and directed that Petitioner be released from custody no later than 11 p.m. this evening.

Although this Office promptly forwarded the May 19, 2026 Order to ICE counsel, operational constraints at the Metropolitan Detention Center ("MDC"), where Petitioner is currently detained, have prevented ICE from facilitating Petitioner's release by the 11 p.m. deadline. The average processing time for an individual being released from ICE custody at MDC is approximately four hours under normal circumstances. However, MDC conducts several mandatory head counts throughout the day, including one that starts at 3 p.m. and concludes at 6:30 p.m.; no releases can be processed at MDC during these head counts. Additionally, MDC closes its gates at 8 p.m. daily, and individuals cannot be released after the gates have been closed. Based on these constraints, ICE counsel has stated that the earliest feasible time for Petitioner's release will be tomorrow, May 20, 2026, at approximately 11:30 a.m.

The undersigned has communicated this information to Petitioner's counsel, Harjot Singh, Esq., who is arranging for members of Petitioner's family to pick him up when he is released from MDC.

Based on the foregoing, Respondents respectfully request that the Court extend their time to file a letter verifying that Petitioner has been released from custody, with all of his belongings that are in Respondents' possession, from tomorrow, May 20, 2026, at 10 a.m., until 1 p.m. that same day.

Respondents thank the Court for its consideration of this submission.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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Cc: Counsel of record by ECF