U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

May 13, 2026

Honorable Sanket J. Bulsara
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Inestroza Carbajal v. Almodovar,* No. 26-cv-2778 (Bulsara, J.)

Dear Judge Bulsara:

This Office represents Respondents in the above-captioned action in which Petitioner Juan Carlos Inestroza Carbajal ("Petitioner") filed a Petition for a writ of habeas corpus on May 8, 2026 challenging his detention by Immigration and Customs Enforcement ("ICE"). *See* Docket Entry ("DE") # 1. Respondents respectfully submit this letter pursuant to Your Honor's Order entered on May 13, 2026 requiring Respondents "to effectuate Petitioner's release by May 13, 2026 at 5:00 P.M. and file a letter on the docket confirming Petitioner's release by that time."

Upon receipt of the Court's order this morning, the undersigned advised ICE and ICE began to make preparations to release Petitioner from the Metropolitan Detention Center ("MDC"). ICE was prepared to release him by approximately 4 p.m., however, around 3:30 p.m. ICE advised that the MDC's computer systems went down and that it was unlikely Petitioner could be released by 5 p.m. ICE requires the use of MDC computer systems to book Petitioner out of MDC. Petitioner's counsel was also made aware of this situation. Respondents do not know how long MDC's computer system will be down. In light of these events, Respondents respectfully request to have up to three hours after the return of MDC's computer systems to release Petitioner, and will advise the Court accordingly. Petitioner's counsel does not consent.

Respondents thank the Court for consideration of this submission.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/ Megan Freismuth
Megan Freismuth
Assistant U.S. Attorney

Cc: Counsel of record by ECF