

**UNITED STATES DISTRICT COURT DISTRICT
OF CONNECTICUT**

D.R.C.C., a minor, and E.E.C.C., a minor, by and
through their Next Friend, T.C.C.,

Plaintiff-Petitioner,

Civil Case No.: 3:26-cv-00759

v.

Robert F. KENNEDY, JR. in his
official capacity as Secretary of
Health and Human Services; Angie
SALAZAR, in her official capacity
as Acting Director of the Office for
Refugee Resettlement; Alex
ADAMS, in his official capacity as
Assistant Secretary of the
Administration for Children and
Families; Randi CAVALLARO, in
her official capacity as Executive
Director of Children's Community
Programs of Connecticut; U.S.
Department of Health and Human
Services (HHS); U.S. Office of
Refugee Resettlement (ORR);
Administration for Children and
Families; Children's Community
Programs of Connecticut,

Defendant-Respondents.

**PLAINTIFF-PETITIONER'S
EMERGENCY MOTION FOR EXPEDITED STATUS CONFERENCE**

In light of the ongoing unlawful detention of D.R.C.C., a 16-year-old child, and E.E.C.C., a 14-year-old-child, the Plaintiff-Petitioner respectfully moves this Court to schedule and convene a status conference in the above-captioned matter as soon as possible.

On May 15, 2026, the Plaintiff-Petitioner filed his Complaint for Injunctive and

Declaratory Relief and Petition for Writ of Habeas Corpus (Dkt. No. 1) (“Complaint/Petition”) seeking the immediate release of D.R.C.C. and E.E.C.C., his children, from the custody of the Defendants-Respondents.

Under 28 U.S.C. § 2243, this Court “shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted . . . within three days unless for good cause additional time, not exceeding twenty days, is allowed.” 28 U.S.C. § 2243. Here, every hour in which D.R.C.C. and E.E.C.C. remain in custody is an affront to the United States Constitution and an extension of the severe emotional and psychological harm that besets them. As described in the Complaint/Petition, D.R.C.C. and E.E.C.C. have now suffered a 163-day deprivation of their fundamental constitutional rights, a traumatizing separation from their father, and all the attendant severe emotional and psychological trauma. They have been detained by the Defendants-Respondents since December 4, 2025, confined in a restrictive setting, deprived of an adequate education, and isolated from their family. They have seen their father only a handful of times since being detained, and only one time over the last month. As the weeks and months pass, D.R.C.C. and E.E.C.C. are suffering from grievous psychological and emotional harm, and are exhibiting physical and emotional symptoms from the trauma of their prolonged detention.

In light of the foregoing and the pending request for injunctive relief, the Plaintiff-Petitioner requests that the Court grant this motion and schedule and convene a status conference on an emergency basis.

Dated: March 15, 2026

Respectfully submitted,

By: /s/ Christopher M. Mattei
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CERTIFICATE OF SERVICE

I, Christopher M. Mattei, counsel of record for the plaintiff-petitioner, do hereby certify that on the above-captioned date a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Christopher M. Mattei
CHRISTOPHER M. MATTEI