U.S. Department of Justice

United States Attorney
Eastern District of New York

271 Cadman Plaza East
Brooklyn, New York 11201

June 18, 2026

By ECF
Honorable Nina R. Morrison
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Cabrera Vicente v. Mullin, et al.*, 26-CV-3365 (Morrison, J.)

Dear Judge Morrison:

This Office represents Respondents in this habeas action, in which Petitioner Osar Armado Cabrera Vicente ("Petitioner") challenges his detention by U.S. Immigration and Customs Enforcement ("ICE"). *See* ECF No. 1 ("Petition" or "Pet."). Respondents write to respectfully request an extension of time to comply with the Court's Order dated June 20, 2026; Petitioner request that the Court extend the time for Petitioner to be released by twenty-four hours. Due to the time-sensitive nature of this request, Respondents' counsel makes this application without having reached out to Petitioner's counsel with regard to this request.

In its June 20th Order, the Court ordered Petitioner to be released by today at 4:00pm. Regrettably, Respondents' counsel did not see the Court's Order until today at 2:50pm. The undersigned is now working diligently with ICE to release Petitioner as soon as possible. Respondents' counsel respectfully requests that the Court extend Respondents' time to comply with its June 20th Order by twenty-four hours, and therefore, release Petitioner no later than 4:00pm on June 21, 2026.

Respondents thank the Court for its time and consideration in this matter.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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cc: All Counsel of Record (by ECF)