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Hon. Brenda K. Sannes
(filed via ecf)

Sauca Zapata v. Venturella, et al., 9:26-cv-01525-BKS

Dear Judge Sannes:

Please accept this letter in opposition to Respondents' request that you modify your injunction enjoining Petitioner's transfer from this District. Undersigned counsel spoke to clients in Batavia very recently, and many new men have recently arrived - many were sleeping on the floor. Moreover, upon information and belief, there was no valid reason to detain Petitioner, who has been in this country for nearly five years, and who was detained in an improper warrantless arrest.

Moreover, as noted by Respondent, the Order enjoining transfer was clearly within this Court's power. *Ozturk v. Hyde*, 136 F.4th 382, 394-396 (2nd Cir. 2025.) In *Ozturk*, a habeas case, the lower court had ordered that the petitioner *be transferred back to Vermont* (where she had been when her petition was first filed) and this was upheld by the Second Circuit, which pointed out that the district court had ample authority to do so.

Thank you.

Respectfully,

s/Kathy Manley
Counsel for Petitioner