

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

D.T.G.,

Petitioner,

v.

William P. JOYCE, *et al.*,

Respondents.

Case No. 25-2161

**DECLARATION OF SAYONI MAITRA IN SUPPORT OF
D.T.G.'S PETITION FOR WRIT OF HABEAS CORPUS**

I, Sayoni Maitra, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge:

1. I am a supervising attorney with the Immigration Law Unit of The Legal Aid Society, counsel for petitioner D.T.G. in the above-captioned case. I am a member of the Bar of the State of New York, and I am admitted to practice in the Southern District of New York. I make this declaration in support of D.T.G.'s petition for a writ of habeas corpus.

2. Attached hereto as Exhibit A is a true and correct copy of U.S. Citizenship and Immigration Services' ("USCIS") I-797A Approval Notice for D.T.G.'s I-821 Application for Temporary Protected Status, as proof of D.T.G.'s TPS valid from May 21, 2024 through at least April 2, 2025.

3. Attached hereto as Exhibit B is an email dated March 7, 2025 from Austin Nielsen-Reagan, a staff attorney at The Legal Aid Society and D.T.G.'s immigration counsel, to

Deportation Officer Michael V. Charles. The subject line is “Urgent request to end illegal detention of [D.T.G.]”

4. Attached hereto as Exhibit C is an email exchange dated March 7-8, 2025 between Mr. Nielsen-Reagan and the outreach email accounts for the Immigration and Customs Enforcement (“ICE”) Enforcement and Removal Operations (“ERO”) New York City Field Office. The subject line is “Urgent request to end illegal detention of [D.T.G.]”

5. Attached hereto as Exhibit D is an email exchange dated March 7-13, 2025 between Mr. Nielsen-Reagan and officials at the ICE ERO New York City Field Office, including Respondent William P. Joyce. The subject line is “Urgent release request for [D.J.T.G.]”

6. Attached hereto as Exhibit E is a true and correct copy of a “Formal Request to End Illegal Detention of TPS Holder [D.J.T.G.]” dated March 13, 2025, submitted by Mr. Nielsen-Reagan via email and U.S. Priority Mail Express to officials at the ICE ERO New York City Field Office, including Respondent William P. Joyce, and ICE attorneys at the Office of the Principal Legal Advisor (“OPLA”) in New York City.

7. Attached hereto as Exhibit F is an email exchange dated March 13, 2025 between Mr. Nielsen-Reagan and ICE attorneys at OPLA New York. The subject line is “[URGENT] Request to Immediately End Illegal Detention of [D.T.G.]”

Dated: March 15, 2025
New York, NY

/s/ Sayoni Maitra
Sayoni Maitra