



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

ALINA HABBA
UNITED STATES ATTORNEY

Matthew J. Mailloux
Assistant United States Attorney

970 Broad Street, Suite 700 main: (973) 645-2700
Newark, NJ 07102 direct: (973) 645-2837
matthew.mailloux@usdoj.gov

June 16, 2025

By ECF

Hon. Evelyn Padin
United States District Judge
MLK Bldg. & U.S. Courthouse
50 Walnut Street
Newark, N.J. 07102

Re: *Tadros v. Noem, et al.*, No. 2:25-cv-4108-EP

Dear Judge Padin:

This Office represents the Government in Petitioner's Writ of Habeas Corpus, concerning his pending removal, authorized under 8 U.S.C. § 1231(a)(6). We write as ordered by the Court in advance of the June 17, 2025 hearing before Your Honor. *See* ECF Nos. 9-10. We respectfully submit the following that addresses Petitioner's appearance at the hearing, anticipated evidence, and anticipated testimony.

Concerning Petitioner's appearance at the June 17, 2025 hearing, we understand that U.S. Immigration and Customs Enforcement ("ICE") is aware of the Court's order to produce Petitioner for the June 17, 2025 hearing at 8:00 a.m. before Your Honor and plans to facilitate his appearance in Your Honor's Courtroom.

Concerning the presentation of additional evidence or witness testimony at the June 17, 2025 hearing, the Government respectfully submits the following. The Government reaffirms the positions taken in its Answer and Response (ECF No. 7). Concerning testimony and exhibits, the Government respectfully refers to the May 30, 2025 Declaration of ICE Supervisory Detention and Deportation Officer, Alexander Cabezas. *See* ECF No. 7-1.

We thank the Court for its time and attention to this case.

Respectfully submitted,

ALINA HABBA
United States Attorney

By: /s/ Matthew J. Mailloux
MATTHEW J. MAILLOUX
Assistant United States Attorney

cc: All Counsel of Record (by ECF)