



U.S. Department of Justice

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District of New Jersey
Civil Division

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August 14, 2025

BY ECF

Honorable Julien Xavier Neals, U.S.D.J.
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Servellon Giron v. Noem, et al.*, Civil No. 25-6301-JXN
Joint Letter Concerning Release and Conditions

Dear Judge Neals:

This Office represents Respondents in the above-referenced habeas matter. We write jointly with Petitioner to provide an update concerning Petitioner's logistics and conditions of release.

Respondents' Position.

Petitioner was released from detention yesterday, August 13. The parties coordinated logistics of his release and have no further logistics to work through. The parties have also successfully worked through certain disputes regarding the conditions of release, which Petition describes more fully below. The sole remaining dispute as to conditions of release is ICE's requirement that Petitioner be fitted with an ankle monitor. ICE does not agree at this time to remove that condition. We attach the release paperwork unredacted, at Petitioner's request.

Petitioner's Position.

Petitioner is a resident of Waldorf, Maryland where he owns his own home. He is employed full-time at Susan Gage Caterers, Inc. as a driver, which occasionally has him driving across state lines and to various government facilities. He has been successfully reporting on an Order of Supervision since 2014 without any criminal arrests or other incident. During the current proceedings, Respondents have never alleged that Petitioner has ever failed to comply with his reporting requirements set

by ICE. He was recently re-detained only due to ICE's newly announced intent to remove him.

Petitioner was released on Wednesday, August 13, 2025. As part of his release, ICE has required he submit to electronic monitoring and was fitted with an ankle monitor. Additionally, his listed address information was incorrect and, based on this, ICE has required to him to appear for reporting at the ICE Field Office in Chantilly, VA.

The parties agree that the ICE records will be updated to reflect Petitioner's current address. Additionally, the parties agree that Petitioner will report to the local ICE Field Office in Baltimore, MD.

Petitioner objects to being subjected to electronic monitoring via ankle monitor. ICE has not demonstrated that electronic monitoring is warranted in this case. Further, the ankle monitor ICE fitted on Petitioner is cumbersome, obtrusive, and may interfere with his ability to do his job. He has current work authorization and is lawfully employed full time. His income supports his family and helps pay the mortgage on his house. Ongoing interference with his employment would have devastating effects (beyond the last 10 weeks of detainment) on his livelihood and his family.

Petitioner asks that the Court order ICE to remove the ankle monitor currently fixed on Petitioner at the earliest possible opportunity. Petitioner further asks that the Court require ICE to seek leave from this Court before subjecting Petitioner to electronic monitoring by any means

* * *

We thank the Court for its attention to this matter.

Respectfully submitted,

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U.S. Deputy Attorney General

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cc: Counsel of Record (by ECF)