



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street  
New York, New York 10007*

July 1, 2025

By ECF

The Honorable Dale E. Ho  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Perez y Perez v. Noem*, No. 25 Civ. 4828 (DEH)

Dear Judge Ho:

This Office represents the government in the above-referenced habeas corpus action. I write respectfully on behalf of the parties pursuant to the Court's June 13 Order directing, *inter alia*, the parties to submit a proposed schedule for briefing on the pending habeas petition. Dkt. No. 14.

Counsel for the parties have conferred, and the petitioner intends to file an amended petition. However, counsel for petitioner also has a medical procedure in the coming weeks, and thus the parties jointly propose the following schedule:

- Amended petition for writ of habeas corpus due July 18, 2025;
- Government's response due July 25, 2025; and
- Petitioner's reply due July 29, 2025.

We thank the Court for its consideration of this letter.

Respectfully submitted,

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

By: s/ Anthony J. Sun  
ANTHONY J. SUN  
Assistant United States Attorney  
86 Chambers Street, Third Floor  
New York, New York 10007  
Telephone: (212) 637-2810  
E-mail: anthony.sun@usdoj.gov

cc: Counsel of Record (by ECF)