



**U.S. Department of Justice**

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*Civil Division*

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September 16, 2025

**Via ECF**

Honorable Claire C. Cecchi  
United States District Judge  
Martin Luther King Jr. United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: *Kitelonga v. Pittman, et al.*, Civil No. 25-12000 (CCC)**  
**Request for an Extension to Respond to Petition by Consent**

Dear Judge Cecchi:

This Office represents Respondents Pittman, et al. in the above habeas matter. We write to respectfully request that the Court extend Respondents' deadline to respond to the habeas petition, from September 16 to September 22, 2025. Joseph Moravec, Esq., counsel for Petitioner, has graciously consented to the September 22, 2025 extension, but he will not consent to any further extension in the matter.

We respectfully submit that there is good cause for the extension as the undersigned is working on an influx of emergent immigration matters while also preparing a response to the complex claims presented in the petition. Further, as the Court is aware, the extension will not disrupt the status quo as the Court has prohibited Petitioner's transfer or removal from Pine Prairie ICE Processing Center until further order of the Court.

Thank you for your consideration of this request.

Respectfully submitted,

TODD BLANCHE  
U.S. Deputy Attorney General

ALINA HABBA  
Acting United States Attorney  
Special Attorney

By: s/Frances C. Bajada  
FRANCES C. BAJADA  
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cc: Counsel of record (ECF)