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October 24, 2025

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Hon. Madeline Cox Arleo
United States District Judge
for the District of New Jersey
Martin Luther King Building and
U.S. Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07101

Rebecca Hufstader

RE: Akhmedov v. Pittman, No. 2:25-cv-13734-MCA

Dear Judge Arleo:

I am writing on behalf of my client, Maksaddzhon Akhmedov, the petitioner in the above-captioned habeas matter pending before the Court. The petition argues, among other claims, that Mr. Akhmedov's detention without a bond hearing has become unconstitutionally prolonged. *See German Santos v. Warden Pike C'ty Corr. Facility*, 965 F.3d 203, 210-11 (3d Cir. 2020). Therefore, I am writing to update the Court on the status of Mr. Akhmedov's pending removal proceedings.

On October 22, 2025, more than four months after the Department of Homeland Security filed its appeal of the immigration judge (IJ)'s decision granting asylum to the Board of Immigration Appeals (BIA), the BIA issued a briefing schedule. Exh I. Both parties have until November 12, 2025 to file their briefs, and either party may seek a twenty-one-day extension of that deadline. *Id.*; *see* BIA Practice Manual 4.7(c)(1)(B).¹ After the briefs have been filed, the BIA will begin adjudicating the appeal. If the BIA grants the appeal, it would likely remand to the IJ for further proceedings.

Therefore, Mr. Akhmedov's "removal proceedings are unlikely to end soon," which "suggests that continued detention without a bond hearing is unreasonable." *German Santos*, 965 F.3d at 211. Given that Mr. Akhmedov has already been detained for over thirteen months and is likely to be detained for significant additional time, Mr. Akhmedov respectfully requests that the Court adjudicate his habeas petition as soon as possible and that it grant the requested relief.

Respectfully Submitted,

/s/Rebecca Hufstader

Rebecca Hufstader, Esq.

CC: All counsel via ECF

¹ Available at <https://www.justice.gov/eoir/reference-materials/bia/chapter-4/7>.