



**U.S. Department of Justice**

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August 7, 2025

VIA ECF

The Honorable Eric C. Tostrud  
United States District Court Judge  
316 N. Robert Street, Suite 334  
St. Paul, MN 55101

RE: Jose Jacob Otero Escalante v. Pamela Bondi, et al.  
Civil No. 25-cv-03051-ECT-DJF

Dear Judge Tostrud:

I write to follow up on the status conference discussion and your Order (ECF No. 17). At your request, ICE agrees not to move Petitioner out of the District of Minnesota until September 5, 2025 or the resolution of the pending habeas matter, whichever comes earlier, with one caveat: in the event of an unforeseen circumstance or contingency and consistent with Petitioner's original request, ICE reserves the option, with 72 hours notice, to apply to the Court for permission to withdraw from this commitment or to move to dissolve any Order memorializing this commitment.

Thank you for your consideration.

Sincerely,

JOSEPH H. THOMPSON  
Acting United States Attorney

*s/ Friedrich A. P. Siekert*

BY: FRIEDRICH A. P. SIEKERT  
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