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Hon. Jennifer M. Rozzoni, U.S.M.J.  
333 Lomas Blvd NW, Suite 20  
Albuquerque, NM 87102

Nov. 17, 2025

Re: Sergei Izbitski v. Carnes, Et. Al  
Docket 1:25-cv-00778

Dear Judge Rozzoni,

The Court's Orders to Show Cause ordered the Respondents to respond within three days of service. The US Attorney was served, including the Summons, on November 10, 2025. All parties had been previously served the complaint, memorandum of law and the Court's Order to Show Cause; even if service was not perfected, the Respondents had actual notice of the issues and this Court's Order. Perfected service upon the parties was completed to the Secretary of Homeland Security on Nov. 12, the Attorney General on Nov. 13, Mr. Carnes on Nov. 10 and the ICE Field Office on Nov. 10. As of the submission of this letter, no response has been submitted.

Petitioner asks the Court to find that his detention is unlawful, to order his immediate release, and to restrain the respondents from any further detention including imposition of any "alternatives to detention" such as GPS monitoring, absent a violation of the terms of his supervision and/or this Court's advance permission.

Respectfully submitted,  
/s/ Eric M. Mark  
Eric M. Mark, Esq.