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*Attorney for Petitioner*

The Honorable Jesse M. Furman (*via ECF*)  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Patel v. Almodovar*, No. 25-cv-7357 (JMF)

Dear Judge Furman:

I represent the Petitioner in the above-referenced habeas corpus action. I write to formally request that Your Honor include in his upcoming order a directive that Respondents not transfer the Petitioner outside the District of New Jersey, where he is presently located. Such an order would maintain the status quo while habeas jurisdiction is litigated, and would also ensure that Petitioner remain close to legal counsel and family.

Numerous courts have found authority to issue such an order in The All Writs Act, [28 U.S.C. § 1651\(a\)](#), which empowers the federal courts to “issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law.” *See Perez Y Perez v. Noem*, 2025 WL 1908284, at \*2, 25-CV-4828 (DEH) (S.D.N.Y. June 13, 2025) (“In light of Petitioner’s interests in participating in further proceedings before this Court and in maintaining adequate access to legal counsel through these proceedings, Petitioner shall not be subsequently transferred except to a facility within this District, the Eastern District of New York, or the District of New Jersey absent further order of this Court.”); *Ozturk v. Trump*, No. 25 Civ. 374, 2025 WL 1145250, at \*15 (D. Vt. Apr. 18, 2025) (ordering petitioner’s transfer from Louisiana to Vermont due, in part, to her pending habeas petition), *stay and mandamus denied*, *Ozturk v. Hyde*, 136 F.4th 382, 403 (2d Cir. 2025); Order, *Sillah v. Barr*, No. 19 Civ. 1747 (S.D.N.Y. Feb. 25, 2019), ECF No. 6 (enjoining respondents from transferring defendant outside of the New York City area while defendant’s habeas petition was pending). *See also Arostegui-Maldonado v. Baltazar*, -- F.Supp.3d --, No. 25-cv-2205, 2025 WL 2280357, at \*16 (D. Colo. Aug 8, 2025) (relying on All Writs Act to enter an injunction preventing immigration detainee’s transfer out of the District of Colorado during the pendency of his habeas action).

Dated: September 5, 2025

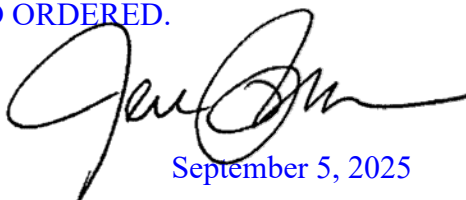
Respectfully submitted,

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The Government shall file any opposition to counsel's request with the declaration discussed on the record at today's conference.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Michael Z. Goldman", written over the typed name and date.

September 5, 2025