



U.S. Department of Justice

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November 7, 2025

BY ECF

Hon. Brian R. Martinotti, U.S.D.J.
U.S. District Court for the District of New Jersey
2 Federal Square
Newark, NJ 07101

**Re: *Torres v. Bondi*, No. 25-15447
Request for Extension of Answer Deadline**

Dear Judge Williams:

This Office represents Respondents in this habeas matter filed by a noncitizen challenging the legality of his detention by U.S. Immigration and Customs Enforcement ("ICE"). We write to respectfully request a one-week extension of the deadline to answer the petition from November 7 to November 14.

Petitioner, who is subject to a final order of removal, filed a habeas petition in the U.S. District Court for the Eastern District of New York on September 5, 2025, asserting, *inter alia*, that his removal to his native Honduras is not reasonably foreseeable. ECF No. 1. On September 10, this matter was transferred to the District of New Jersey. ECF No. 16, 17. On October 31, this Court directed Respondents to answer the petition in seven days, or November 7. ECF No. 18. Since October 31, this Office has worked with ICE to obtain the relevant information related to Petitioner's travel and removal from the United States. However, although ICE has preliminarily indicated to this Office that his removal is imminent and it expects to obtain all travel documents shortly, ICE did not have sufficient time to coordinate the disclosure approvals, and transmission, of the relevant documents to this Office in time for today's answer deadline. Accordingly, Respondents respectfully request a seven-day extension, until November 14, to file its response.

Yesterday, we sought the consent of Petitioner's counsel of record, the Law Office of Joshua Bardavid, by email and telephone. Counsel indicated that they are unsure if they still represent Petitioner and accordingly cannot consent or oppose this request on his behalf. Counsel has not responded to our request for confirmation or answered whether Petitioner is represented by another firm not listed on the docket.

We thank the Court for its attention to this request.

Respectfully submitted,

TODD BLANCHE
U.S. Deputy Attorney General

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By: *s/ Alex Silagi*
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cc: Counsel of record (by ECF)