



**U.S. Department of Justice**

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December 17, 2025

VIA ECF

Hon. Judge Cronan  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

**Re: *Dong v. Almodovar, et al.* 25 Civ. 7630 (JPC)**

Dear Judge Cronan:

This Office represents the government in the above-referenced habeas corpus action. I write respectfully to provide the Court with a further update concerning the status of Petitioner's removal and to request that this matter be dismissed as moot. More specifically, this Office has been advised that ICE executed Petitioner's valid, final removal order on December 15, 2025, effectuating his removal from the United States to the People's Republic of China, so Petitioner is no longer in ICE custody. As a result, this action is moot and should be dismissed. *See, e.g., Pena v. Lynch*, 257 F. Supp. 3d 346, 347-48 (S.D.N.Y. 2017) (petitioner's removal rendered habeas corpus petition challenging lawfulness of detention moot); *see also, e.g., Hassoun v. Searls*, 976 F.3d 121, 130 (2d Cir. 2020) (detention challenge moot where petitioner had been removed from the United States); *Escobar-Hernandez v. Barr*, No. 20 Civ. 9714 (RA), 2021 WL 1863972, at \*2-3 (S.D.N.Y. May 10, 2021) (same); *De La Cruz v. DHS*, No. 20 Civ. 2219 (AJN), 2021 WL 431037, at \*2 (S.D.N.Y. Feb. 8, 2021) (dismissing petition challenging detention and seeking stay of removal as moot after the petitioner was removed from the United States); *Diop v. Sessions*, No. 18 Civ. 8245 (ALC), 2019 WL 1894387 (S.D.N.Y. Mar. 20, 2019) (same); *Li v. Shanahan*, No. 16 Civ. 2351 (PAE) (BCM), 2016 WL 7077110 at \*3 (S.D.N.Y. Oct. 25, 2016) (habeas petition moot "[b]ecause petitioner has already been removed from the United States, [and] the court can no longer grant the relief she sought"), *rep. & recomm'n adopted*, 2016 WL 7106033 (S.D.N.Y. Dec. 5, 2016).

Accordingly, the Court should dismiss this action as moot. I thank the Court for its consideration of this submission.

Respectfully submitted,

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