



**U.S. Department of Justice**

United States Attorney  
District of New Jersey  
*Civil Division*

ALINA HABBA  
ACTING UNITED STATES ATTORNEY

*Brooks E. Doyne*  
Assistant United States Attorney

970 Broad Street, Suite 700  
Newark, NJ 07102  
[brooks.doyne@usdoj.gov](mailto:brooks.doyne@usdoj.gov)

main: (973) 645-2700  
direct: (973) 297-4390

November 5, 2025

**Via ECF**

Honorable Susan D. Wigenton, U.S.D.J  
United States District Court  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 0710

**Re: *Salas v. Soto*, Civ. No. 25-15713 (SDW)  
Status Update to Report Voluntary Departure**

Dear Judge Wigenton:

This Office represents Respondents in the above-referenced habeas matter. We write respectfully to report that Petitioner has elected voluntary departure from the United States.

On September 16, 2025, Petitioner, a noncitizen then in the custody of U.S. Customs and Immigration Enforcement ("ICE"), filed this habeas action challenging her detention. ECF No. 1. On October 6, 2025, the Court issued an Order to Answer, directing Respondents to answer the petition by October 13, 2025. ECF No. 5. On October 8, 2025, after granting Respondent's request for an extension, the Court directed Respondents to "provide 72-hours' notice to this Court and Petitioner's counsel before moving Petitioner from her current location." ECF No. 8. Respondents filed their answer on October 27, 2025. ECF No. 9. Petitioner's reply was due November 4. We accordingly contacted Petitioner's counsel, Jill S. Westerberg, Esq., when Petitioner did not file a reply brief. Petitioner's counsel informed this Office for the first time that Petitioner had voluntarily departed the United States on October 17, 2025, and this Office did not know of that voluntary departure until that disclosure from Petitioner's counsel. Given the Court's October 8 Order directing Respondents to provide 72-hours' notice before moving Petitioner, and because this Office learned only yesterday of Petitioner's voluntary departure, we write to provide this status update. We have further requested Petitioner's counsel's position on

whether this matter is now moot. We are awaiting a written response from Petitioner's counsel.

We thank the Court for Your Honor's consideration of this matter and status update.

Respectfully submitted,

TODD BLANCHE  
U.S. Deputy Attorney General

ALINA HABBA  
Acting United States Attorney  
Special Attorney

By: *s/ Brooks E. Doyne*  
BROOKS E. DOYNE  
Assistant United States Attorney  
*Attorneys for Respondents*

cc: All Counsel of Record (via ECF)