

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

LAZARO EZEQUIEL AJCAC CULAY,

Petitioner,

v.

Case No. 1:25-cv-00900-JLS

JOHN DOE, Facility Director, Buffalo
Federal Detention Facility; TODD LYONS,
Acting Director, U.S. Immigration and
Customs Enforcement; KRISTI NOEM, U.S.
Secretary of Homeland Security; PAMELA
BONDI, U.S. Attorney General; JANE DOE,
Director of Executive Office for Immigration
Review,

Respondents.

NOTICE OF MOTION

MOVING PARTY:	Petitioner
PLACE:	The Honorable John L. Sinatra, Jr. United States District Judge Robert H. Jackson United States Courthouse 2 Niagara Square Buffalo, New York 14202
RELIEF SOUGHT:	Petitioner respectfully moves for an Order entitling him to a bond hearing on the merits pursuant to 8 USC § 1226(a)
RETURN DATE:	Absent court order, Local Rule of Civil Procedure 12(b)(2)(B) provides that any responding papers be filed within 14 days of the motion and any reply filed within 7 days of the responding papers.
PAPERS SUBMITTED:	Memorandum of Law and Declaration of Counsel w/attached Exhibits

Petitioner reserves the right to submit reply papers to any opposition which may be filed.

Dated: December 5, 2025

Respectfully submitted,

/s/ Benjamin B. Tymann
Benjamin B. Tymann, Mass. BBO #652011
Admitted Pro Hac Vice
Tymann, Davis & Duffy, LLP
45 Bromfield Street, 6th Floor
Boston, MA 02108
Tel. 617.933.9490
btymann@tddlegal.com

Paul O'Dwyer
Law Office of Paul O'Dwyer, P.C.
134 West 26 Street, Suite 902
New York NY 10001
(646) 230-7444
paul.odwyer@paulodwyerlaw.com

CERTIFICATE OF SERVICE

I, Benjamin B. Tymann, hereby certify that on this 5th day of December, 2025, I served a copy of the foregoing via ECF filing on:

Adam A. Khalil
DOJ-USAO
100 State Street, Suite 500
Rochester, NY 14614
585-399-3979
Email: adam.khalil@usdoj.gov