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November 24, 2025

VIA CM/ECF

Hon. Meredith Vacca  
United States District Judge  
Western District of New York  
100 State Street  
Rochester, NY 14614

**Re: Status Update**  
**Case No.: 1:25-cv-00902-MAV**  
**Falcon Tenelema v. Freden, et al.**

Dear Judge Vacca:

This office represents Petitioner in his matter. We are in receipt of the Respondents' letters filed this morning. Dkt. Nos: 7 and 8. Prior to this notice, Petitioner did not know that the immigration court had denied the motion to reopen as the immigration court only denied the motion on November 20, 2025.

Based on this new information, Petitioner intends to file a Temporary Restraining Order shortly and, subsequently, an amended petition. Respondents have already provided written consent for us to file the amended petition. But this stipulation to file an amended complaint is not intended to stop the removal of Petitioner, which is why a Temporary Restraining Order is required.

Please feel free to contact me with any questions or concerns.

Respectfully submitted,

Aaron J. Aisen