

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Carlos OROZCO FUENTES)	
)	Case No. 1:25-cv-00365
Petitioner,)	
)	MOTION TO EXCUSE
v.)	PHYSICAL PRESENCE
)	
)	
PATRICIA HYDE, Field Office Director,)	
MICHAEL KROL, HSI New England Special)	
Agent in Charge, and TODD LYONS, Acting)	
Director U.S. Immigrations and Customs)	
Enforcement, KRISTI NOEM, U.S. Secretary)	
of Homeland Security, Pamela BONDI, U.S)	
Attorney General; EXECUTIVE OFFICE FOR)	
IMMIGRATION REVIEW,)	
)	
Respondents.)	
)	

Now comes Petitioner Carlos Orozco Fuentes, by and through counsel, and respectfully moves this Honorable Court to excuse Mr. Orozco Fuentes' physical appearance at the hearing on his petition, currently scheduled for 4:30pm on September 23, 2025.

As grounds, counsel for Mr. Orozco Fuentes is authorized to appear, to make all necessary representations on his behalf, and, pursuant to this Court's order, the hearing may occur via video.

Undersigned counsel recognizes that if the government acknowledges the court's reasoning in Jimenez v. FCI Berlin, Warden, --- F. Supp. 3d ----, 2025 WL 2639390 (D.N.H. Sept. 8, 2025), controls, the instant motion would become moot.

WHEREFORE, the undersigned respectfully requests that, should the hearing proceed, the Court grant this Motion to Excuse Physical Presence.

Respectfully submitted
Carlos OROZCO FUENTES
By and through his Attorney,
/s/ Ryan P. Sullivan
Ryan P. Sullivan, Esq.
NH. BBO No. 278931
300 High Street
Andover, MA 01810
(978) 474-0054

Dated: September 23, 2025

CERTIFICATE OF SERVICE

I, Ryan P. Sullivan, herein certify that on this 23rd day of September, 2025, a copy of the within appearance was filed VIA ECF for all parties involved.

/s/ Ryan P. Sullivan
Ryan P. Sullivan, Esq.