

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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ALVARO LARA MARTINEZ,

Petitioner,

v.

25-CV-06526-EAW

PAM BONDI,

KRISTI NOEM,

TODD LYONS, and

JOSEPH E. FREDEN, Deputy Field Office Director, Buffalo  
Federal Detention Facility,

Respondents.<sup>1</sup>

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**JOINT STIPULATION**

The parties hereby stipulate as follows, and respectfully request that the Court so-order the following:

1. Petitioner was transferred to, and arrived at, the Adams County Correctional Center in Natchez, Mississippi on September 30, 2025.
2. The habeas petition in this case was filed on October 1, 2025 (ECF No. 1).
3. Because Petitioner was in the Southern District of Mississippi at the time of filing, and no longer under the custodianship of the ICE Buffalo Field Office, the proper jurisdiction for this action is the Southern District of Mississippi. *See, e.g., ARZOU HAMI, Petitioner, v. JOSEPH FREDEN et al., Respondents.*, No. 25-CV-585-LJV, 2025 WL 2840708, at \*1 (W.D.N.Y. Oct. 7, 2025).
4. The parties jointly request that the Court order the transfer of this action to the Southern District of Mississippi and that Petitioner be given leave to amend the Petition to include the correct custodian in the caption.

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<sup>1</sup> Joseph E. Freden is the Deputy Field Office Director, and the immediate custodian of Petitioner, and has therefore been substituted for “Warden” pursuant to Federal Rule of Civil Procedure 25(d). The “Batavia Federal Detention Facility” has been corrected to the “Buffalo Federal Detention Facility”.

**DATED:** October 8, 2025

**BRIAN GREEN**

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**SO ORDERED:**

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HON. ELIZABETH A. WOLFORD  
CHIEF UNITED STATES DISTRICT JUDGE