

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

JONATHAN S. ABADY
MATTHEW D. BRINCKERHOFF
ANDREW G. CELLI, JR.
RICHARD D. EMERY
DEBRA L. GREENBERGER
DIANE L. HOUK
DANIEL J. KORNSTEIN
JULIA P. KUAN
HAL R. LIEBERMAN
ILANN M. MAAZEL
KATHERINE ROSENFELD
ZOE SALZMAN
SAM SHAPIRO
EARL S. WARD
O. ANDREW F. WILSON

ATTORNEYS AT LAW
ONE ROCKEFELLER PLAZA
8TH FLOOR
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbawm.com

DANIEL M. EISENBERG
VASUDHA TALLA

CLAIRE Z. ABBADI
ERIC ABRAMS
NICK BOURLAND
HANNAH BRUDNEY
SARA LUZ ESTELA
BIANCA HERLITZ-FERGUSON
LAURA S. KOKOTAILO
SONYA LEVITOVA
HAFSA S. MANSOOR
SANA MAYAT
DANIEL A. PEÑA
VIVAKE PRASAD
MAX SELVER
MAGGIE TURNER
EMILY K. WANGER
RACHAEL WYANT
SYDNEY ZAZZARO

November 10, 2025

Via ECF

Hon. Cathy Seibel
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, New York 10601

Re: *E.J.C.C. v. Joyce, et al.*, No. 25 Civ. 8805 (CS)
Motion for Leave to File Brief of *Amici Curiae* Youth Detention Experts

Dear Judge Seibel:

We respectfully move through this letter for leave to submit the attached *amici curiae* brief on behalf of five organizations that advocate for children and youth who are placed in detention settings in support of Petitioner E.J.C.C.'s Petition for a writ of habeas corpus.¹ Petitioner consents to, and Respondents do not oppose, this motion.

Given that there is no applicable rule of civil procedure governing *amicus curiae* briefs, “[d]istrict courts have broad discretion to permit or deny an appearance as *amicus curiae* in a case.” *In re GLG Life Tech Corp. Sec. Litig.*, 287 F.R.D. 262, 265 (S.D.N.Y. 2012) (internal quotation marks omitted). “The usual rationale for *amicus curiae* submissions is that they are of aid to the court and offer insights not available from the parties.” *Auto. Club of N.Y., Inc. v. Port Auth. of N.Y. & N.J.*, No. 11 Civ. 6746 RJH, 2011 WL 5865296, at *1 (S.D.N.Y. Nov. 22, 2011).

¹ No party’s counsel authored this brief in whole or in part; no party or party’s counsel contributed money that was intended to fund preparing or submitting this brief; and no person other than the *amici curiae* or their counsel contributed money that was intended to fund preparing or submitting this brief.

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Here, the proposed *amici curiae* Children’s Defense Fund; the Kairos Center for Religion, Rights, and Social Justice; EdTrust-New York; the Young Center for Immigrant Children’s Rights; and Children’s Rights (together, the “Youth Detention Expert *Amici*”), are organizations sharing the common goal of promoting the welfare and safety of children and youth who are impacted by immigration detention, including protecting them from serious harm that detention poses to minors, and protecting their educational rights. The Youth Detention Expert *Amici*’s proposed brief provides an overview of academic studies and research reports from advocacy organizations documenting how detention, including in Office of Refugee Resettlement congregate facilities like where E.J.C.C. is detained now, causes long-term harm to children and youth.

The Youth Detention Expert *Amici* have a strong interest in the outcome of this case, and their brief provides unique insights into the nature and effects of youth immigration detention. Accordingly, on behalf of *amici*, undersigned counsel respectfully request that this Court grant leave to file the attached proposed *amicus curiae* brief in support of Petitioner E.J.C.C.’s petition for a writ of habeas corpus.

Respectfully submitted,

/s/

Katherine Rosenfeld
Nick Bourland

*Attorneys for Proposed Amici Curiae
Youth Detention Exerts*

Encl.: Ex. A

c. All counsel of record (via ECF)