



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

November 13, 2025

**BY ECF**

The Honorable Jeannette A. Vargas  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *O.G. v. Francis et al.*, No. 25 Civ. 8977 (JAV)

Dear Judge Vargas:

This Office represents the respondents in this case, in which O.G. (“Petitioner”) filed a petition of habeas corpus challenging his immigration detention. ECF No. 1. On October 30, 2025, this Court entered an order staying Petitioner’s removal from the United States while it considers the habeas petition, ECF No. 9, and on November 12, the Court entered a temporary restraining order preventing U.S. Immigration and Customs Enforcement (“ICE”) from transferring Petitioner from the Orange County Jail while the Court considers the instant motion, ECF No. 21. The undersigned forwarded a copy of the Court’s temporary restraining order to ICE counsel at around 9:00 a.m. on November 12, and heard back around 3:00 p.m. the same day that the order had been provided to ICE’s Enforcement and Removal Operations unit, which had updated its system to reflect the order.

I write in response to Petitioner’s letter motion of November 11, 2025, which asks this Court to enjoin ICE from transferring Petitioner from the Orange County Jail to any other detention facility while the Court considers his habeas petition. ECF No. 19. Upon further consideration, ICE does not oppose entry of such an order.

I thank the Court for its consideration of this matter.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

By:           s/Jean-David Barnea            
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cc: Counsel of Record (via ECF)