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December 1, 2025

VIA ECF

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

Re: *O.G. v. Francis et. al.*, Case No. 25-cv-8977
Letter re Petitioner's Unknown Location

Dear Judge Vargas,

Petitioner writes to request that the Court order Respondents to provide an update to the Court and parties regarding Petitioner's location, as it is presently unknown to undersigned counsel.

On Wednesday, November 26, 2025, while on a video call with his social worker at Brooklyn Defender Services, Petitioner appeared gravely ill. His social worker contacted officials at the Orange County Jail (OCJ) to request that medical personnel immediately assess Petitioner. After the call, his social worker and immigration counsel repeatedly contacted staff at OCJ and Immigration and Customs Enforcement (ICE) to find out the status of Petitioner. Eventually, they were told that he had been transferred to an area hospital but ICE would not tell counsel which hospital. Counsel learned, from calling area hospitals, that he had been transferred to Garnet Hospital but staff at Garnet informed us that he was transferred further to Westchester Hospital. However, after calling Westchester Hospital on several different days, the hospital will not confirm whether he was ever admitted there or is presently there.

Despite repeated requests, ICE has to date not provided any information beyond that Petitioner was taken to a hospital for surgery on Friday for potential gastrointestinal bleeding. They would not provide the name of the hospital. The OCJ scheduling system for calls indicates that Petitioner has been released. ICE's detainee locator says his location is still OCJ.

Yesterday, we reached out to counsel for Respondents, Assistant United States Attorney Barnea. This morning, he confirmed that Petitioner was taken to the hospital on Friday and scheduled for surgery, but that he was waiting an update from ICE as to current location and condition. Undersigned counsel has not heard further information since this morning. Prior to filing this letter, counsel asked for an update from Mr. Barnea and informed him that if an update were not provided I would be filing a letter with the Court. At the time of this filing, undersigned counsel has not received a response.

Given concerns that we have received no information about Petitioner's location since his medical emergency on Wednesday, November 26, 2025, particularly given the injunction in place prohibiting his transfer to another immigration detention facility, undersigned counsel respectfully requests that the Court order Respondents to provide an update to the Court and parties as to his current location and condition.

Dated: December 1, 2025
New York, NY

Respectfully Submitted,

/s/ Alexandra Lampert
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cc: Counsel for Respondents