



**U.S. Department of Justice**

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**Via Electronic Filing**

Honorable Karen Williams, U.S.D.J.  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Camden, N.J. 08101

**Re: *Li v. Bondi, et al., No. 25-17139*  
Supplemental Update Regarding Removal Deadline**

Dear Judge Williams:

This Office represents Respondents in this petition for a writ of habeas corpus filed by a noncitizen detained by U.S. Immigration and Customs Enforcement (“ICE”). We write to provide an update on this fully briefed habeas petition and the Respondents’ request to vacate the November 7, 2025, Order enjoining Respondents from removing Petitioner to the People’s Republic of China (“PRC”).

On November 26, Respondents submitted an update on efforts to remove Petitioner to PRC and to seek vacatur of the November 7 Order prohibiting transfer. ECF 7. Petitioner did not respond to the request. On December 12, Respondents submitted an answer to the petition and requested the Court dismiss or deny the petition and vacate its November 7 Order as it relates to moving Petitioner outside of New York or New Jersey and allow ICE to remove Petitioner to PRC. ECF 8. On December 18, Petitioner submitted a reply. ECF 10. Petitioner acknowledged that ICE has now obtained the travel document necessary to effectuate his removal but argued that removal was still not reasonably foreseeable. *Id.*

Respondents have previously noted that, on November 5, 2025, the Embassy of the PRC issued a permit to Petitioner for reentry to the country, and Petitioner has three months from the date of issuance to return to China, until February 5, 2026. ICE notified this Office of its immediate intent to remove Petitioner to China but recognized the Court’s Order prohibiting transfer out of the state. Given the upcoming deadline of the travel document, Respondents respectfully submit that no further issues remain outstanding and request permission to effectuate Petitioner’s removal before the February 5, 2026, deadline in roughly thirty days.

Thank you for your consideration of this matter.

Respectfully submitted,

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U.S. Deputy Attorney General

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Chief of Staff &  
Associate Deputy Attorney General  
Special Attorney

By: s/ Brooks E. Doyne  
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cc: Counsel of record (by ECF)