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*VIA CM/ECF*

November 17, 2025

Honorable Judge Kiel  
United States District Judge for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

**RE: 25-17186, PEREZ V. LYONS, et al.**

Judge Kiel,

Petitioner Alex Perez (“Petitioner” or “Mr. Perez”) filed a Petition for a Writ of Habeas Corpus and an Application for an Order to Show Cause why the Petition should not be granted in this matter on November 4, 2025. ECF No. 1. On November 5, 2025, this Court issued an Order to Answer that set the briefing deadlines in this matter. ECF No. 3. Respondents were ordered to file an answer to all claims by November 12, 2025, and Petitioner was permitted to file a reply by November 17, 2025. *Id.*

Mr. Perez has addressed Respondents’ arguments in his Petition and asserts that the weight of precedent in this district and others make clear that his continued detention is unlawful and that he should be released from immigration detention or, alternatively, afforded an individualized bond hearing at this time. Therefore, Mr. Perez hereby advises the Court that he does not intend to file a formal reply in this matter and, unless the Court otherwise orders further briefing, this matter is now fully briefed.

Respectfully submitted,

s/ Alex Mintz  
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**American Friends  
Service Committee**

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**CERTIFICATE OF SERVICE**

I, undersigned counsel, hereby certify that on this date, I filed this Letter using the CM/ECF system which will notify all counsel of record in this matter.

Dated: November 17, 2025

Respectfully submitted,

s/ Alex Mintz

Alex Mintz, Esq.

Senior Staff Attorney

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