

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SARA VALERIA VELASQUEZ-GOMEZ,
Petitioner,

- against -

LUIS SOTO, in his official capacity as Facility
Director, Delaney Hall Detention Center;
ALEXANDER CABEZAS, in his official capacity
as Director for the Newark Field Office for
Immigration and Customs Enforcement; KRISTI
NOEM, in her official capacity as Secretary of
Homeland Security; PAMELA JO BONDI, in her
official capacity as Attorney General of the United
States of America,

Respondents.

No. 2:25-cv-17327

**NOTICE OF MOTION TO COMPEL RESPONDENTS TO RETURN
PETITIONER TO THIS DISTRICT**

PLEASE TAKE NOTICE that as soon as counsel may be heard, I, Anwen Hughes, hereby move this Court pursuant to Local Rule 7.1 for an Order compelling the return of Petitioner, Ms. Sara Valeria Velasquez-Gomez, to the District of New Jersey. Petitioner sought Respondents' agreement to voluntarily return on Petitioner on November 13, 2025 in light of this Court's Order of November 12, 2025 enjoining her transfer; and, having not received a reply about Respondents' position, advised Respondents of her intent to file this motion on

November 16, 2025. To date, Respondents have not taken a position on this Motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Petitioner shall rely upon the annexed Memorandum of Law and Declaration of Nathan Yaffe.

It is respectfully requested that the Court rule upon this Motion, without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this application.

Dated: November 19, 2025
New York, NY

/s/ Anwen Hughes
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