



December 30, 2025

Honorable Brian J. Martinotti
United States District Judge
District of New Jersey
Martin Luther King Building and U.S. Courthouse
50 Walnut Street, Newark, New Jersey 07101

**Re: *Velasquez-Gomez v. Soto et al.*, No. 2:25-cv-17327 (BJM)
Petitioner's Withdrawal of Motion to Enforce**

Dear Judge Martinotti:

Petitioner Sara Valeria Velasquez-Gomez writes to provide a significant update with respect to her custody status, in light of which she believes her pending Motion to Enforce has been mooted.

After Ms. Velasquez-Gomez filed the Motion to Enforce, Dkt. 11, Immigration and Customs Enforcement ("ICE") advised counsel for Respondents that it would consider a written request from Ms. Velasquez-Gomez to remove the GPS ankle monitor it had imposed earlier in the month. Subsequently, the undersigned made such a request, and thereafter ICE scheduled Ms. Velasquez-Gomez for an appointment at which it removed the GPS ankle monitor. As of this time, her supervision has been reduced to a *de minimis* requirement of monthly virtual check-ins.

In Ms. Velasquez-Gomez's view, ICE's amelioration of the conditions of supervision has obviated the need to pursue the pending Motion. She therefore requests to withdraw her Motion to Enforce.

Respectfully Submitted,

/s/ Anwen Hughes
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SARA VALERIA VELASQUEZ-GOMEZ

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/ Anwen Hughes
Anwen Hughes
Human Rights First

Dated: December 30, 2025