



**U.S. Department of Justice**

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December 15, 2025

The Honorable Lawrence J. Vilardo  
United States District Judge  
Robert H. Jackson United States Courthouse  
2 Niagara Square  
Buffalo, New York 14202

**Re: Quiroz v. Marich, et al.  
25-CV-01166-LJV**

Dear Judge Vilardo:

ICE has advised me that Petitioner's claim of fear has been adjudicated and that he may be removed to Ecuador. The only impediment to removal is this Court's order staying it. If this Court lifts its order, Petitioner can be removed within the next 14-21 days. Thus, as it stands, Petitioner is in the odd position of both arguing that his detention is or will become prolonged and is not significant likely to occur within the reasonably foreseeable future, but it is this very same challenge that is preventing his removal at present.

ICE respectfully requests that this Court lift its order staying removal so that it can execute the removal order, which would render this matter moot.

Respectfully submitted,

MICHAEL DIGIACOMO  
Acting United States Attorney  
Western District of New York

BY: /s/ ADAM A. KHALIL  
Assistant United States Attorney