

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

Jose Sergio Tenezaca-Quiroz,)	
)	Case No. 25-cv-1166 (LJV)
Petitioner,)	
)	
v.)	
)	
Tammy Marich, Acting Director of Buffalo)	
Field Office of Immigration and Customs)	
Enforcement;)	
Kristi Noem, Secretary of the Department of)	
Homeland Security;)	
Pamela Bondi, Attorney General,)	
)	
)	
in their official capacities,)	
)	
Respondents.)	
)	

NOTICE OF MOTION

MOVING PARTY:	Petitioner
PLACE:	Hon. Lawrence J. Vilaro United States District Judge Robert H. Jackson United States Courthouse 2 Niagara Square Buffalo, New York 14202
RELIEF SOUGHT:	Leave to amend Verified Petition for Writ of Habeas Corpus, pursuant to Rule 15(a)
RETURN DATE:	Unless the Court orders otherwise, 14 days
PAPER SUBMITTED:	Memorandum of Law, Proposed First Amended Petition for Writ of Habeas Corpus

Dated: December 31, 2025
Kew Gardens, New York

/s/ Reuben S. Kerben, Esq.
Counsel for Petitioner