



U.S. Department of Justice

United States Attorney' Office
District of New Jersey
Civil Division

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BY ECF

Honorable Karen M. Williams, U.S.D.J
Mitchell H. Cohen US Courthouse
4th & Cooper Streets
Camden, NJ 08101

**Re: *Bonilla v. Soto*, Civ. No. 25-17390(KMW)
Update on Bond Hearing**

Dear Judge Williams:

This Office represents Respondents in this habeas matter filed by a noncitizen challenging the legality of his detention by U.S. Immigration and Customs Enforcement ("ICE") pursuant to 8 U.S.C. § 1225(b)(2). Pursuant to the December 31, 2025 Order, ECF No. 3, we write to respectfully update the Court regarding the status of Petitioner's detention and bond hearing.

Please be advised that Petitioner agreed to Voluntarily Depart the United States for Venezuela. However, due to the current state of affairs in Venezuela, ICE has been unable to secure Petitioner a flight into the country. As a result, a bond hearing is scheduled for Petitioner for tomorrow, January 13, 2026, at 9:30 a.m. This Office has been in communication with Peter Crossley, Esq., counsel for Petitioner, and he concurs with this update. Mr. Crossley will appear at tomorrow's bond hearing and the parties will provide your Honor with an update regarding the results of the hearing within the next three days.

We thank the Court for its attention to this matter.

Respectfully submitted,

TODD BLANCHE
U.S. Deputy Attorney General

JORDAN FOX
Chief of Staff & Associate Deputy
Attorney General
Special Attorney

By: s/ Margaret Ann Mahoney
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cc: Counsel of record (by ECF)