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December 15, 2025

Hon. Lawrence J. Vilardo
United States District Judge
2 Niagara Square
Buffalo, New York 14202

**Re: Torres Alonzo v. Freden
25-CV-01172-LJV**

Dear Hon. Lawrence J. Vilardo:

Please accept this letter as a request to leave this matter open temporarily pending resolution of the bond situation. Petitioner remains released, but continues to wear an ankle monitor fitted by ICE and ICE continues to request that he post an additional \$5,000.00 bond despite not having received a refund of his prior \$5,000.00 bond money. In addition, ICE held Petitioner for several hours at 250 Delaware after ordering him to present himself there, and informed his employer that he was being again detained, before releasing him after undersigned counsel reached out to counsel for Respondents and apparently a phone call was made. Since then, I have received reports that ICE is now targeting Petitioner's spouse with enforcement actions.

I am not, at this time, asking the Court to enforce its order, as I believe the parties ought to be able to resolve the pending issues without taking up the Court's time but I respectfully ask that the matter not be closed and that an order be issued for a status update from the government on a reasonable timeframe, regarding the status of Mr. Torres' bond and the ankle monitor. It is my understanding that ICE took the initiative to fit the ankle monitor until such time as the new \$5,000.00 amount is posted, despite this Court's direction for the government to handle the movement of the \$5,000.00 bond money internally (i.e., by cancelling the refund process for the previous bond that ICE unilaterally "revoked").

Respectfully submitted,

/s/ Matthew Borowski

Matthew Borowski
Counsel for Petitioner