



**U.S. Department of Justice**

*United States Attorney  
Western District of New York*

100 State Street, Suite 500  
Rochester, New York 14614

(585) 263-6760  
fax (585) 399-3920  
Writer's Direct: (585) 399-3979  
Adam.Khalil@usdoj.gov

December 2, 2025

The Honorable Elizabeth A. Wolford  
Chief United States District Judge  
Kenneth B. Keating Federal Building  
100 State Street  
Rochester, New York 14614

**Re: De Oliveria v. Moniz, et al.  
25-CV-06663-EAW**

Dear Chief Judge Wolford:

To the extent this Court will treat Petitioner's status report as a motion to enforce the prior order requiring a hearing, please note that in order to obtain a transcript of the bond hearing I have to request it from the Executive Office of Immigration Review in the form of an audio file, and then send it out for transcription. The hearing is not usually transcribed unless an appeal is taken to the Board of Immigration Appeals.

I would respectfully request at least 10 days' time to respond to a motion to enforce, given these extra steps that must be taken.

Respectfully submitted,

MICHAEL DIGIACOMO  
Acting United States Attorney  
Western District of New York

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