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Practice Elsewhere Limited to Federal Immigration Law

December 2, 2025

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

**Re: Avelino Sabate v. Freden, et al.
1:25-cv-01192-LJV**

Dear Hon. Lawrence J. Vilardo:

I hereby submit the affirmation of Jose Perez, Esq., immigration counsel for Petitioner Oslady Avelino Sabate, explaining that while Respondents did comply with the Court order dated 11/20/2025 to provide her with a bond hearing within seven days (said bond hearing having been held on 11/26/2025), despite Petitioner's family posting the bond amount immediately thereafter, she was not released from the jail where ICE was holding her until five days later -- on 12/1/2025 -- and then was fitted with an ankle monitor in direct contravention of the Immigration Judge's order.

I was informed by Mr. Perez that ICE will be removing the ankle monitor in order to comply with the IJ's bond order, and therefore I do not believe there is any further action is necessary in this matter at this time, but I just wanted to make the Court aware of what I believe

is an unwarranted and illegal prolongation of Petitioner's time in custody, which caused her to be detained for 5 additional days, because ICE is not releasing people in a timely manner after bond is posted, as well as the fact that ICE does not seem to be concerned with following the IJ orders with respect to alternatives to detention.

Respectfully submitted,

/s/ Matthew Borowski

Matthew Borowski
Counsel for Petitioner