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November 19, 2025

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By ECF

The Honorable Dale E. Ho
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Mejia Segovia v. Joyce, et al.*, 25-CV-9551 (DEH)

Dear Judge Ho:

On November 18, 2025, at 5:28PM, I was notified by Petitioner's family that the Petitioner was moved to an undisclosed location and in violation of Your Honor's Order from November 17, 2025. When I input Petitioner's information into the ICE detainee locator, it reveals zero results. This surreptitious transfer occurred, upon information and belief, following service on Respondent's counsel.

Notwithstanding that Petitioner had already been moved, this morning, November 19, 2025, at 8:41 AM, the Department of Homeland Security filed Form I-830 notifying the Immigration Court that Petitioner is currently detained at the Elizabeth Contract Detention Facility, 625 Evans Street, Elizabeth, NJ 07201. This filing was rejected by the Immigration Court for inaccuracies. On November 14, 2025, the Department previously filed a Form I-830 informing the Immigration Court that the Petitioner was detained at Orange County Correctional Facility, 110 Wells Farm Road, Goshen, NY 10924. This filing was likewise rejected by the Immigration Court for inaccuracies. These notices are attached herein.

We respectfully request that Your Honor Orders Petitioner's immediate return to this district, or in the alternative, his immediate return to the District of New Jersey in compliance with the November 17, 2025, Order.

I thank the Court for its consideration of this request.

Respectfully submitted,

Rafael Gilbert

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