

**ROBERT F.
KENNEDY
HUMAN
RIGHTS**

November 21, 2025

BY ECF

Hon. John L. Sinatra, Jr.
United States District Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

Re: *Mateo Francisco v. Kurzdorfer et al*, 1:25-cv-01194-JLS

Dear Judge Sinatra:

RFK Human Rights and Prisoner's Legal Service (PLS) represent the Petitioner in this matter on a *pro bono* basis.

Petitioner's counsel is writing to request that the Court Court hear Petitioner's motion for temporary restraining order with respect to transfer and seventy-hour (72) business notice today, November 21, 2025. Upon information and belief and based upon representations to counsel for Petitioner by the Buffalo Federal Detention Facility is scheduled to be transferred on or before November 22, 2025. Therefore, we respectfully request that the Court hear the parties today, November 21, 2025, rather than November 24, 2025.

Petitioner's counsel conferred with Respondents' counsel who advised that he does not oppose being heard on this date if the Court is available.

Respectfully submitted,

/s/ Sarah T. Gillman

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