



**U.S. Department of Justice**

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December 26, 2025

**By ECF**

Hon. Renée Marie Bumb, C.U.S.D.J.  
U.S. District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Room 1050  
Camden, NJ 08101

**Re: *Gu. v. Almodovar*, 25-cv-17746-RMB  
Bond Hearing Status Update**

Dear Chief Judge Bumb:

This Office represents Respondents in the above-referenced matter in which Petitioner seeks a bond hearing or release from immigration detention. We write in response to the Court's December 13, 2025 order, ECF No. 29, and to provide a follow-up status report regarding Petitioner's forthcoming bond hearing. We also write to respond to Petitioner's recent request for release from detention. ECF No. 32.

As Respondents previously reported, U.S. Immigration and Customs Enforcement ("ICE") returned Petitioner to New Jersey on December 16, 2025, and submitted a motion to the Executive Office of Immigration Review ("EOIR") to change the venue for his immigration proceedings back to the Elizabeth, New Jersey, immigration court. Unfortunately, ICE informed this Office that the venue motion before EOIR remained unresolved by the day of Petitioner's bond hearing on December 23, 2025, which happened before an immigration judge in the Oakdale, Louisiana, immigration court. ICE further reports that the immigration judge in Oakdale adjourned the bond hearing until the matter transferred to Elizabeth while not immediately ruling on the venue motion. Petitioner's recent letter recounts much the same events. ECF No. 32.

ICE informs this Office that as soon as the Oakdale immigration court resolves the venue motion and transfers Petitioner's immigration case to the Elizabeth immigration court, they again will seek a bond hearing under § 1226(a), consistent with the Court's Order. Respondents therefore respectfully request an extension until Monday, January 5, 2026 to complete all these steps in light of the recent federal

holidays (Dec. 24-26) and the upcoming January 1 holiday, during which EOIR is closed and ICE is unable to obtain a bond hearing before an immigration judge. If the Court is inclined to order release because of the unique circumstances of this case, Respondents suggest that ICE should be permitted to impose conditions on Petitioner's release, including ongoing monitoring.

Thank you very much for your consideration of this status update.

Respectfully submitted,

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U.S. Deputy Attorney General

JORDAN FOX  
Chief of Staff & Associate Deputy  
Attorney General  
Special Attorney

By: /s/ John T. Stinson  
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cc: Counsel of Record