

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ANDERSON RIBEIRO LINS,

Petitioner,

v.

25-CV-01230-JLS

TAMMY MARICH, in her official capacity as Acting Field
Office Director, Buffalo Field Office, Enforcement and Removal
Operations, U.S. Immigration & Customs Enforcement, et al.,

Respondents.

NOTICE OF MOTION

MOVING PARTY:

Respondents

PLACE:

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

RELIEF SOUGHT:

Respondents respectfully move for an Order
dismissing the Petition pursuant to Federal Rule
of Civil Procedure 12(b)(1) and (6).

RETURN DATE:

Absent court order, Local Rule of Civil Procedure
12(b)(2)(B) provides that any responding papers be
filed within 14 days of the motion.

PAPERS SUBMITTED:

Memorandum of Law

Respondents reserve the right to submit reply papers to any opposition filed.

Respectfully submitted,

MICHAEL DIGIACOMO
United States Attorney

DATED: December 19, 2025
Rochester, New York

BY: /s/MARVIN MULLER
Special Assistant United States Attorney