



U.S. Department of Justice

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January 2, 2026

Via Electronic Filing

Hon. Renée Marie Bumb, C.U.S.D.J.
United States District Court, D.N.J.
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

**Re: *Cruz Lopez v. Borgen*, No. 25-cv-17850 (RMB)
Respondents' Request to Lift Transfer Restriction**

Dear Chief Judge Bumb:

This Office represents Respondents in the above-referenced habeas matter filed by a noncitizen challenging the legality of his detention by U.S. Immigration and Customs Enforcement ("ICE") pursuant to 8 U.S.C. § 1225(b)(2). As this Office previously advised, the Elizabeth Immigration Court conducted a custody redetermination concerning Petitioner pursuant to 8 C.F.R. § 1236 on December 11, 2025, and denied Petitioner's request for a change in custody status. Resp'ts' Letter, ECF No. 15.

On December 18, 2025, the Elizabeth Immigration Court issued Petitioner an order of removal. *See* Ex. 1 (Dec. 18, 2025 Order of the Immigration Judge). Petitioner waived appeal of the removal order. *Id.* at 2. In light of the foregoing, Respondents respectfully request that the Court lift its November 24, 2025 order prohibiting Respondents from transferring Petitioner from New Jersey during the pendency of this proceeding, Order, ECF No. 2 at 3, so that ICE can effectuate Petitioner's removal. Petitioner's counsel has advised that they do not object to this request.

Should Your Honor have any questions or concerns, please do not hesitate to contact this Office. Thank you very much for your consideration of this request.

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Respectfully submitted,

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Encls.