

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

VICTOR ANELIO VERA ANDRADE,

Petitioner,

v.

25-CV-01277-JLS

ANDREW OLIVERI, Acting Assistant Field Office Director at
Buffalo (Batavia) Federal Processing Center, et al.,

Respondents.

NOTICE OF MOTION

MOVING PARTY: Respondents

PLACE: The Honorable John L. Sinatra, Jr.
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)(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 and any reply filed within 7 days of the
responding papers.

PAPERS SUBMITTED: Memorandum of Law

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

Respectfully submitted,

MICHAEL DIGIACOMO
United States Attorney
Western District of New York

BY: /s/ADAM A. KHALIL
Assistant United States Attorney

filed.

Respectfully submitted,

MICHAEL DIGIACOMO
United States Attorney
Western District of New York

BY: /s/ADAM A. KHALIL
Assistant United States Attorney
100 State Street, Suite 500

Respectfully submitted,

MICHAEL DIGIACOMO
United States Attorney
Western District of New York

BY: /s/ADAM A. KHALIL
Assistant United States Attorney
100 State Street, Suite 500