



U.S. Department of Justice

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December 4, 2025

VIA ECF

The Honorable Jeffrey M. Bryan
United States District Judge
316 North Robert Street
St. Paul, MN 55101

Re: *Victor Vazquez Avilez v. Bondi et al.*, No. 25-cv-04480-JMB-ECW

Dear Judge Bryan,

I write pursuant an order the Court entered this morning, directing the Federal Respondents to file a letter by noon today "indicating whether they will agree not to move Petitioner outside of the District of Minnesota pending the matter's resolution." Dkt. 10, at 5.

I conferred with agency counsel and confirmed that the Federal Respondents will agree not to move Petitioner outside of Minnesota pending the resolution of this habeas action, with one important caveat: the Federal Respondents should be allowed to move Petitioner if emergency circumstances arise (such as emergent health or safety issues related to the petitioner or the facility). The Federal Respondents will give the Court 72 hours' advance notice of any such emergency move.

Please let me know if the Court requires any further information or assurances from the Federal Respondents.

Sincerely,

DANIEL N. ROSEN
United States Attorney

s/ Trevor Brown

BY: TREVOR C. BROWN
Assistant United States Attorney