

LAW OFFICE OF THEODORE N. COX, ESQ.

www.tncoxlaw.com
325 Broadway, Suite 201
New York, New York 10007
Telephone: (212)925-1208
Facsimile: (212)624-0232

December 8, 2025

By ECF

Hon. John L. Sinatra, Jr.
United States District Judge
U.S. District Court for the Western District of New York
2 Niagara Square
Buffalo, NY 14202

**Re: Yang v. Bondi, et al, Case No. 1:25-cv-1313-JLS
Joint Letter Regarding Proposed Briefing Schedule (Dkt.#2)**

Dear Judge Sinatra:

This Office represents Petitioner in this action. Pursuant to the Court's Text Order dated December 5, 2025 (Dkt. #2), directing the parties to confer and submit a proposed briefing schedule on the habeas petition filed under 28 U.S.C. § 2241, the parties write to advise the Court of the results of that conferral.

Counsel conferred in good faith but were unable to reach agreement on a briefing schedule.

Petitioner's Proposal:

Because this is a *detained* § 2241 habeas action and the relief sought concerns ongoing custody, Petitioner respectfully proposes the following expedited schedule:

1. Respondents' Answer/Response due 14 days from the Court's order adopting a schedule;
2. Petitioner's Reply due 14 days after the filing of Respondents' Answer/Response.

Petitioner submits that this schedule is consistent with the urgency inherent in habeas review and ensures meaningful judicial consideration of Petitioner's detention.

Respondents' Proposal:

Respondents propose that the Respondents' Answer/Response due 30 days from the Court's order adopting a schedule. Respondents state that they require at least 30 days to obtain and review the A-file and complete necessary internal and agency review before filing a response.

Because the parties could not agree, we respectfully submit both proposed schedules for the Court's consideration.

Thank you for the Court's attention to this matter.

Respectfully submitted,

s/Theodore Cox
Theodore Cox, Esq.
Law Office of Theodore Cox
Counsel for Petitioner

Cc: Marvin J. Muller III, *Counsel for Respondents* (by ECF)