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December 16, 2025

*By ECF*

Hon. Lawrence J. Vilardo
United States District Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

Re: Gonzalez-Castillo v. Freden, et al., No. 1:25-cv-01350-LJV
Petitioner's Reply to Government's Response and Request for Immediate Relief

Dear Judge Vilardo:

I represent Petitioner Feliciano Gonzalez-Castillo in the above-referenced habeas corpus petition.

On December 11, 2025, the Court issued an order directing Respondents to show why this Petition should not be granted and why the Petitioner should not receive a bond hearing in light of this Court's decision in *Alvarez Ortiz v. Freden*, --- F.Supp.3d ---, 2025 WL 3085032 (W.D.N.Y. Nov. 4, 2025). ECF No. 2. Respondents have since responded and acknowledged that this Court's prior decisions, holding that detainees similarly situated to Petitioner are held under 8 U.S.C. § 1226, control the outcome in this case. ECF No. 6. It follows then that the Petition should be granted and the Petitioner is entitled to a bond hearing.

Considering Respondents' concession and this Court's order, Petitioner respectfully submits that the Court should immediately grant the Petition.

We appreciate the Court's continued attention to this matter.

Respectfully submitted,

/s/ Jonathan Langer
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