

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

FELICIANO CASTILLO-GONZALEZ,)	
)	
Petitioner,)	Civil Action No. 1:25-cv-01350-LJV
)	
v.)	
)	Hon. Judge Lawrence J. Vilardo
JOSEPH E. FREDEN, ET AL.,)	
)	
Respondents.)	

**EMERGENCY MOTION FOR CLARIFICATION
OF THE COURT’S ORDER OF DECEMBER 23, 2025**

The Petitioner, by and through undersigned counsel, moves this Honorable Court to clarify the Court’s order of December 23, 2025. Counsel for the Petitioner conferred with counsel for the Respondents on the evening of December 23, 2025, and the Respondents do not oppose clarification. In support of this motion, the Movant states as follows:

1. In compliance with this Honorable Court’s Text Order dated December 16, 2025, the Respondents held the scheduled Bond Hearing for the Petitioner on December 23, 2025 at 3:30 p.m. The Immigration Judge (“IJ”) ordered bond in the amount of \$6,500.00, and issued the written order at 4:55 p.m. [**Exhibit 1 – Bond Order**]

2. It is undisputed between the parties that U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations (“ICE ERO”) is open for purposes of detention and arrest, but **not** for acceptance of bond payments from 3:00 p.m. on Tuesday, December 23, 2025 through Monday, December 29, 2025 at 9:00 a.m.

3. Respondents have requested through their counsel in this case that the Petitioner’s family pay the bond via bank check in person at the Buffalo Service Processing Center in Batavia, New York, where he is detained in order for him to be released. It is Respondents’ position that, as they are willing to accept payment of the bond in person, they are not “unable to process

payment of that bond by 12/24/2025 at noon due to administrative closures,” therefore, presumably, are not required to release the Petitioner at noon unless payment is made in person via bank check at the detention center.

4. Counsel for the Petitioner requested clarification from counsel for the Respondents as to whether this was a normal process, or if it was outside the regular procedures, whether the Petitioner would get a receipt, the name of the ICE officer accepting the bond, why payment could not be submitted via the ICE CeBonds system, and other details.

5. Counsel for the Respondents replied, stating that “[t]his is a usual process called ‘lobby bond’” but that his point of contact is the ICE ERO Assistant Field Office Director, who doesn’t do this himself and the bond specialist was not at work as it was 6:45 p.m., that the officer accepting bond would provide his name, the Petitioner would receive a receipt, and that payment via the ICE CeBonds national system was not possible as the staff is off for the holiday.

6. Counsel for the Petitioner further requested information such as the name of the payee for a bank check, detailed information about what documentation is required for payment of the bond, who may pay, etc. Counsel for the Respondents has promptly responded to multiple e-mails on the evening of December 23, 2025, and responded at 8:49 p.m. to advise as to the name of the payee (“Department of Homeland Security”) and at 9:00 p.m. as to what documentation will be required of the person delivering the bank check (government ID only). The Petitioner’s family will need to leave their home no later than 6:00 a.m. on December 24, 2025, in order to be at the detention facility at noon.

7. The Petitioner’s family has obtained approval/a commitment from Rosa Santana, Bond Director, Envision Freedom Fund, a New York City-based non-profit, for payment of the Petitioner’s bond. However, no one from the non-profit can pay the bond in person at the Buffalo

Service Processing Center, which is approximately six (6) hours away from their location. They can pay the bond at the ICE ERO office located at 26 Federal Plaza, Room 9-110, New York, NY 10278 (and could pay the bond tomorrow if that office were open), but not until that office reopens next week.

Wherefore, given the circumstances, counsel for the Petitioner respectfully requests that this Honorable Court clarify its order of December 23, 2025 to indicate whether: Respondents are to release the Petitioner with an ankle monitor no later than noon on December 24, 2025, and accept payment of the bond on December 29, 2025 upon the reopening of the ICE ERO office located at 26 Federal Plaza, Room 9-110, New York, NY 10278; or, in the alternative, whether the Petitioner is required to provide payment of the “lobby bond” via bank check at the Buffalo Service Processing Center on December 24, 2025 in order to be released, and if so, by what time and date the Respondents are required to provide specific, detailed instructions as to the documentation and information that will be required of the family member submitting the bond.

Dated: December 23, 2025

Respectfully submitted,

s/ Amy Maldonado
Amy Maldonado (IL ARDC # 6256961)
Managing Attorney
Law Office of Amy Maldonado LLC
333 Albert Ave., Suite 390
East Lansing, MI 48823-4351
Tel. (517) 803-2870
Fax: (888) 299-3780
Email: amy@amaldonadolaw.com

Attorney for Petitioner (pro hac vice)