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*Pro Bono Counsel for Petitioner*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CARLOS TORRES,

*Petitioner,*

v.

LUIS SOTO, in his official capacity as  
Director of Delaney Hall;

TODD LYONS, in his official capacity  
as Acting Director of the Immigration  
and Customs Enforcement;

KRISTI NOEM, in her official capacity  
as Secretary of the Department of  
Homeland Security;

PAMELA BONDI, in her official  
capacity as Attorney General of the  
United States;

*Respondents.*

Case No. 1:25-cv-18578

**NOTICE OF MOTION TO  
ENFORCE OR RECONSIDER**

For the reasons explained in the Memorandum of Law in support of this Motion, Petitioner Carlos Torres Madero (“Mr. Torres”) respectfully moves this Court to enforce its December 19, 2025, Order, ECF No. 3, or reconsider the due process arguments submitted in his petition and motion for a TRO or PI, ECF. No. 2-2.

Dated: December 28, 2025

Respectfully submitted,

/s/ Lauren Major

Lauren Major  
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### CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Motion to Enforce or Reconsider and all attachments using the CM/ECF system, which will notify counsel of record. I further certify that I have notified counsel for Respondents of the filing of this motion and emailed copies of these documents to AUSA Frances Bajada at the following email address:

frances.bajada@usdog.gov

Dated: December 28, 2025

Respectfully submitted,

/s/ Lauren Major

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