

Lauren Major
American Friends Service Committee
570 Broad St., Ste. 1001
Newark, NJ 07102
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
HOLD IN CIVIL CONTEMPT**

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 declare Respondents in civil contempt, based on their failure to comply with this Courts orders of December 19, 2025, ECF No. 3, and December 29, 2024, ECF No. 5, to order Mr. Torres’s immediate release, and to enjoin Respondents from re-detaining Mr. Torres absent a showing of materially changed circumstances.

Dated: December 30, 2025

Respectfully submitted,

/s/ Lauren Major
Lauren Major
Managing Attorney
American Friends Service Committee
Immigrant Rights Program
570 Broad Street, Suite 1001
Newark, NJ 07102
T: 973-854-0267
E: lmajor@afsc.org

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Motion to Hold in Civil Contempt and all attachments using the CM/ECF system, which will notify counsel of record.

Dated: December 30, 2025

Respectfully submitted,

/s/ Lauren Major

Lauren Major
Managing Attorney
American Friends Service Committee
Immigrant Rights Program
570 Broad Street, Suite 1001
Newark, NJ 07102
T: 973-854-0267
E: lmajor@afsc.org