



**U.S. Department of Justice**

United States Attorney's Office  
District of New Jersey  
*Civil Division*

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December 30, 2025

**Via ECF**

Hon. Renée Marie Bumb, C.U.S.D.J.  
United States District Court  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Room 1050  
Camden, NJ 08101

**Re: *Torres v. Soto*, No. 25-18578  
Update Confirming Petitioner's Release**

Dear Chief Judge Bumb:

This Office represents Respondents in the above-referenced habeas matter. We write in response to the Court's December 29, 2025, text order, ECF No. 5, and Petitioner's motion to hold Respondents in contempt, ECF No. 6.

On December 19, 2025, at 3:21 p.m., this Office notified U.S. Immigration and Customs Enforcement ("ICE") of the Court's order issued that day, ECF No. 3, to schedule a bond hearing. Because ICE was unable to have the immigration court timely schedule the bond hearing, on December 29, 2025, the Court issued an order at 8:42 a.m., ECF No. 5, directing Petitioner's release within 24 hours while a bond hearing was pending. This Office informed ICE of the Court's release order that same day at 12:43 p.m. Today, December 30, 2025, ICE informed this Office that it released Petitioner at 8:42 a.m. this morning. Petitioner's status update, ECF No. 7, confirms that Petitioner was released this morning, although Petitioner alleges the release occurred at "approximately 9:09 a.m." instead of 8:42 a.m.

Given the above chronology, Respondents respectfully request the Court deny Petitioner's contempt motion. Our Office timely notified ICE of all Court orders, and ICE made diligent efforts to comply with the Court's order for immediate release, ECF No. 5, even though there is an approximate 27-minute dispute between the parties as to the time of Petitioner's release.

Thank you very much for your consideration of this matter.

Respectfully submitted,

TODD BLANCHE  
U.S. Deputy Attorney General

JORDAN FOX  
Chief of Staff & Associate Deputy  
Attorney General  
Special Attorney

By: /s/ John F. Basiak Jr.  
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cc: Counsel of record (by ECF)