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December 29, 2025

Via CM/ECF  
Chambers of Hon. Vernon D. Oliver  
450 Main Street  
Hartford, CT, 06103

**Re: *E.H.C.F. v. Kennedy, et. al.*, No. 3:25-cv-02142 (VDO)**

Judge Oliver:

Pursuant to the Court's order, dated December 23, 2025, the parties have conferred and respectfully submit this joint letter concerning (1) whether the conference scheduled for December 30, 2025 is necessary; (2) how the Court should handle the petition for habeas corpus and the motion for preliminary injunction; and (3) a proposed briefing schedule (expedited or otherwise). The parties respectfully submit that the conference should proceed as scheduled on Tuesday, December 30, 2025.

**A. Position of the Plaintiff-Petitioner**

It is the Plaintiff-Petitioner's position that the conference should proceed as scheduled. E.H.C.F. is a 16-year-old child who has been detained and separated from his family for nearly eight months in flagrant violation of the United States Constitution and the Trafficking Victims Protection Act ("TVPRA"), 8 U.S.C. § 1232, et. seq. As in the recent case of *Lema Lala v. Wesling*, et. al., No. 3:25-cv-02125 (VDO), Defendant-Respondents should voluntarily release Plaintiff-Petitioner immediately to the custody of his mother, and no further litigation should be necessary. However, should Defendant-Respondents fail to release E.H.C.F. by the time of the status conference scheduled for December 30, 2025, Plaintiff-Petitioner takes the following positions:

1. The court should forthwith order habeas relief as permitted by 28 U.S.C. § 2243 without further briefing.
2. In the alternative, the Court should order the Government to show cause why the Petition should not be granted, and to file its opposition to the Plaintiff-Petitioner's Motion for TRO and Preliminary Injunction, by no later than 5:00 p.m. on December 31, 2025.
3. Plaintiff-Petitioner proposes a Reply deadline of 5:00 p.m. on January 5, 2026.

4. The court should hold a hearing on the Petition and the Motion for TRO and Preliminary Injunction on January 7, 2026, or in the alternative, no later than January 9, 2026.

**B. Position of the Defendant-Respondents**

Counsel for the Defendant-Respondents has asked that the following be submitted to the Court in connection with this letter:

1. The Department of Homeland Security (“DHS”) and the Office of Enforcement and Removal Operations are not parties to this litigation.
2. The detention of E.H.C.F. by the Office of Refugee Services (“ORR”), a component of the Department of Health and Human Services, is not unlawful or unconstitutional. The child was lawfully referred by DHS to HHS/ORR custody pursuant to 8 U.S.C. § 1232(b)(3).
3. ORR has actively worked on the sponsorship application of E.H.C.F. since it was originally received. The continued detention of E.H.C.F. has not been caused by any unreasonable delay on the part of ORR. Examples include, concerns expressed by the minor about living with the sponsor and the discovery of a new household member who was not disclosed by the sponsor.
4. The Defendants have been actively working to adjudicate the sponsorship application in this case. However, ORR is required to look into disclosures made by the child, including the child’s disclosure that [REDACTED], during the assessment process prior to making a decision as to whether this child could be safely released to the care and custody of his mother. Absent any additional unexpected delays, ORR expects the additional vetting to be completed within 15-20 business days.

Respectfully submitted,

FOR THE PLAINTIFF-PETITIONER:

/s/ Leanne R. Gale

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