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Practice Elsewhere Limited to Federal Immigration Law

Hon. Brenda K. Sannes, Chief U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse NY 13261-7336

Via CM/ECF

Re: 9:26-cv-00118-BKS Gaspar v. Akshar et al

March 6, 2026

Dear Hon. Brenda K. Sannes:

Please accept this letter motion requesting that the Court accept my EAJA fee application. I have conferred with opposing counsels Emer Stack and Joshua Terrell and neither of them take any position on this request. Due to the extremely high workload at my office, and to our billing paralegal taking some personal days, I was unable to collect the necessary information to meet the Court's deadline of March 3 for EAJA fee application. I respectfully ask the Court to accept this late-filed application.

Respectfully submitted,

/s/ Matthew Borowski

Matthew Borowski

Counsel for Petitioner

Time Expended on Julian Alcon Gaspar N.D.N.Y. Habeas Matter:

TASK	DATE	HOURS EXPENDED
Drafting of Petition for Writ of Habeas Corpus	1/20/2026-1/23/2026	6.5
Preparation of Cover Sheet, Filing and Correspondence with Clerk's Office	1/23/2026	1.0
Correspondence was U.S. Attorney's Office, Service of Process by E-mail	1/23/2026	0.5
Drafting of Letter to Judge	1/25/2026	0.25
Review of Responses to Petition	1/27/2026	2.0
Drafting of Traverse	1/29/2026	1.5
Hearing attendance	2/5/2026	0.5
Review of Decision and Order	2/17/2026	0.5

Total hours: 12.75 hours**Hourly rate:** \$500**Total fees:** \$6,375.00