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February 27, 2026

VIA CM/ECF
Hon. Brenda K. Sannes
Chief U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse, New York 13261-7336

Re: *Hassan v. Bondi et al.*: Emergency Letter Motion
Case No.: 9:26-cv-00319-BKS

Dear Chief Judge Sannes:

This office represents Respondents in this matter. ICE informs me Petitioner was apprehended yesterday and is currently temporarily held in a Montgomery County facility. Prior to receipt of the Order to Show Cause (Dkt. # 2), Petitioner was scheduled for transfer to a detention facility in Batavia, New York. Because the Order to Show Cause enjoins Respondents "from moving Petitioner outside the jurisdiction of the Northern District of New York until this civil action is resolved," Petitioner's previously scheduled transfer has been cancelled to comply with the Order. ICE is currently attempting to secure long-term housing for Petitioner in a different facility within the Northern District of New York. However, ICE respectfully requests this Court grant it leave to transfer Petitioner to Batavia, within the Western District of New York, which has space to house Petitioner and where he was scheduled for transfer prior to the Order to Show Cause.

Therefore, Respondents respectfully request a modification to the Order to Show Cause such that Petitioner can be detained in either the Western District of New York or the Northern District of New York. For the purposes of this case, Respondents would agree not to challenge venue or jurisdiction in the Northern District of New York based on any transfer to a facility in the Western District of New York. Should the Court wish to schedule an emergency hearing on this issue, I am available at its convenience.

I have sought consent from Petitioner's counsel via e-mail at 10:31 a.m. this morning but I have not heard back. I also called Petitioner's counsel's office at 11:12 a.m. and was told Petitioner's counsel was currently unavailable but would call me back. I have not yet heard from Petitioner's counsel.

I appreciate the Court's consideration of this matter.

Respectfully Submitted:

TODD BLANCHE
Deputy Attorney General

JOHN A. SARCONE III
First Assistant United States Attorney

By: /s/David M. Katz
David M. Katz
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