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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-00319-BKS *Hassan v. Bondi et al.***

February 27, 2026,

Dear Hon. Brenda K. Sannes:

I am in receipt of Respondents' emergency letter motion seeking amendment of the Order enjoining movement of Petitioner outside of the district. Petitioner is **OPPOSED** to modification of the order to permit his movement to the Western District of New York. Petitioner is represented by Halinka Zolchik, accredited EOIR representative with Prisoners' Legal Services. Ms. Zolchik is working on his immigration matter and is based in Albany, New York. If he is moved to Batavia, he will be four hours away and it will be difficult or impossible for Ms. Zolchik to work with him. We are also concerned that, when he is released, he may be released in cold weather without personal belongings far away from family and friends who could assist him, and could die of hypothermia.[1]

Respectfully submitted,

*/s/ Matthew Borowski*

Matthew Borowski
*Counsel for Petitioner*

[1] This is not a speculative concern. Numerous noncitizens have been released by Respondents without adequate provision for their transportation to return home. Earlier this week, one of them was found dead. See, e.g., "A nearly blind refugee is found dead after Border Patrol agents drop him at Buffalo doughnut shop" available at: https://apnews.com/article/buffalo-new-york-refugee-death-b2d29a7bdfaa0ffd99d4c6ba7e85e8a6