**United States Department of Justice**

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June 18, 2026

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: *De Rocha v. Akshar, et al.*
Civil Action No. 26-cv-01263 (BKS)

Dear Judge Sannes:

I write on behalf of the Federal Respondents in the above-captioned action to respectfully request, with Petitioner's consent, that the Court modify its Order (Dkt. 4) to permit Petitioner's detention within either the Northern ***or Western*** Districts of New York during this action.

At approximately 3:22 P.M. today, this Court issued an order that, *inter alia*, enjoins Respondents from moving Petitioner outside the Northern District of New York during this action. *See* Dkt. 4. The Order was served on the United States Attorney's Office via a notice of electronic filing at 3:22 P.M. I immediately informed ICE of the Order, but, according to agency counsel, Petitioner had already departed Broome County Correctional Facility and was in transit to the Buffalo Federal Detention Facility prior to this Court's Order enjoining transfer. Based on this information, the Federal Respondents do not intend to challenge this Court's jurisdiction over this habeas proceeding. However, given the circumstances of Petitioner's transfer, the Federal Respondents respectfully request that the Court modify its Order to extend the geographic restriction to permit Petitioner's detention at the BFDF within the Western District of New York.

I have conferred with Petitioner's counsel, who advised that he consents to this proposed modification of the Court's Order.

Thank you for your consideration of this request.

Respectfully submitted,

TODD BLANCHE
Acting Attorney General

JOHN A. SARCONE III
First Assistant United States Attorney

By: *s/ Emer M. Stack*
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