UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

PUTHARACHIYAMNI SOMASUNDARAM,

Petitioner,

v.

MICHAEL NESSINGER, et al.,

Respondents.

Civil Action No.
26-CV-545-JJM-AEM

EMERGENCY JOINT MOTION FOR MODIFICATION OF THE COURT'S AUGUST 16 ORDER

The Petitioner, Putharachiyamni Somasundaram, and Respondents, by and through undersigned counsel, hereby move to request modification for this Court's August 16, 2026, Text Order only to allow for Respondents to facilitate Petitioner's transfer and return from his present location in Rapides Parish, Louisiana to Donald W. Wyatt Detention Facility in Central Falls, Rhode Island.

The Parties jointly request that the Court enter a modification order only authorizing Respondents to transfer Petitioner from Louisiana back to Rhode Island, with an intermediate stop in Ohio.

The Parties anticipate the transfer will proceed as follows: (a) Rapides Parish, Louisiana to Youngstown, Ohio, on or about Monday, August 17, 2026; and (b) Youngstown, Ohio to Central Falls, Rhode Island with the transfer to be completed no later than August 19, 2026, subject to routine scheduling, security, and operational contingencies, and with counsel for Petitioner to receive prompt notice of Petitioner's location at each stage. Undersigned counsel will advise Respondents to file an I-830 as soon as possible in anticipation to Petitioner's bond hearing, which is currently scheduled on Tuesday, August 18, 2026, at 9:30 AM at the Laredo Immigration Court.

Additionally, should the Court grant this motion, EOIR will reschedule a bond hearing in the Immigration Court in Chelmsford, Massachusetts, for a date as early as possible after the Petitioner's return to Rhode Island.

Dated: August 16, 2026

Respectfully submitted,

TODD BLANCHE
Attorney General

CHARLES C. CALENDA
First Assistant United States Attorney
District of Rhode Island

/s/ Trevor Griffin

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CERTIFICATE OF SERVICE

I hereby certify that, on August 16, 2026, I filed the foregoing document through this Court's Electronic Case Filing (ECF) system, thereby serving it upon all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and Local Rule Gen 304.

/s/ Trevor Griffin
Trevor J. Griffin
Assistant United States Attorney