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Via Electronic Filing

Hon. Robert Kirsch, U.S.D.J.
United States District Court, D.N.J.
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

December 24, 2025

Re: *Coto Sac v. Doe et al.*, Case No. 3:25-cv-18244 (RK)

Dear Judge Kirsh:

I am counsel for Petitioner in the above matter, which is a petition for a writ of habeas corpus.

I write with regard to this Court's order (ECF No. 9) directing Respondents to hold a bond hearing by December 30th, 2025. I respectfully request that the Court extend that date to no later than January 10th, 2025, for the following reasons.

First, due to the Christmas and new year holiday, our office will be closed on December 30, 2025, because both Mr. O'Dwyer (the PHV attorney) and myself will be out of the country on that date. Secondly, based on the partial judgement issued in the class action *Maldonado Bautista v. Noem*, No. 25-cv-1873, 2025 WL 3678485 (C.D. Cal. Dec. 18, 2025), I filed a request for a bond hearing in Immigration Court, approximately one hour before the entry of the order yesterday, asking for a hearing no earlier than the 7th (again, because of the prior scheduled travel). To avoid the scheduling of a hearing on a date on which counsel is unavailable, and to be consistent with our prior request to the Immigration Court, I respectfully request that the deadline by which the bond hearing must be held be extended to January 10.

I have reached out to AUSA, Kevin Maggio, and he consented to this extension request.

Sincerely yours,

s/ Alexander Krause Rossebo
Alexander Krause Rossebo

cc. AUSA Kevin J. Maggio, via ECF

SO ORDERED


Robert Kirsch, U.S.D.J.

Date: 12/29/25