

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JORGE IVAN VALENCIA OSORNO,

Petitioner,

v.

PATRICIA HYDE, Field Office Director,  
MICHAEL KROL, HIS New England Special  
Agent in Charge,  
TODD LYONS, Acting Director U.S.  
Immigrations and Customs Enforcement, and  
KRISTI NOWM, U.S. Secretary of Homeland  
Security,

Respondents.

Civil Action No. 1:25-CV-11592-NMG

**JOINT MOTION OF THE PARTIES FOR RECONSIDERATION  
OF THE COURT'S ORDER (Docket No. 7)**

The Parties, by and through their attorneys, herein file this Joint Motion for Reconsideration of the Court's Order (Docket No. 7) setting the date of June 16, 2025, for Respondents to respond to the Petition. As grounds for this motion the Parties state as follows:

1. Counsel for their respective parties have known each other for years as members of the Massachusetts bar and take their roles and responsibilities extremely seriously. As a result, over the years they have worked well together to identify when resolutions can be reached regarding the various cases they have handled.
2. Regarding this case, counsel for the Parties initially spoke upon the filing of this habeas petition and identified a path for avoiding unnecessary litigation, and thus simultaneously saving judicial resources.
3. Since the habeas petition was filed, as of today the Petitioner has been returned to Massachusetts and is currently detained at the Plymouth County House of Corrections. Also,

the Respondent has been served with a Notice to Appear for removal proceedings and counsel for the Respondent is filing a request for a bond hearing, which is anticipated to be heard next week before the Chelmsford, MA Immigration Court.

4. The Parties anticipate three possible outcomes to the bond hearing. First, if the Petitioner is released on bond without the need for an electronic monitoring system, then the habeas petition will be dismissed by the Petitioner. Second, if the Petitioner is released on bond but is assigned an electronic monitoring system, the Petitioner may seek relief from the electronic monitoring system through the habeas petition. Third, if the Petitioner is denied bond, then he may seek relief through the habeas petition, but the Respondents would oppose the habeas petition based on a lack of jurisdiction argument.
5. Given that the Parties anticipate that the focus of the habeas petition will become significantly narrowed, or even possibly moot on or before June 27, 2025, the Parties respectfully request that the Court reconsider its Order (Docket No. 7) and allow the Respondent up to and including June 27, 2025, to respond to the habeas petition.

Wherefore, based on the above, the Parties herein request that the Court reconsider its Order (Docket No. 7), and allow the Respondent up to and including June 27, 2025, to respond to the habeas petition.

Respectfully submitted,

Jorge Ivan Valencia Osorno  
The Petitioner

/s/ Anthony Drago  
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**CERTIFICATE OF SERVICE**

I, Rayford A. Farquhar, Assistant United States Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: June 16, 2025

By: /s/ Rayford A. Farquhar  
RAYFORD A. FARQUHAR  
Assistant United States Attorney

**LOCAL RULE 7.1 CERTIFICATION**

I, Rayford A. Farquhar, Assistant United States Attorney, hereby certify that I spoke with Attorney Anthony Drago, counsel for the Petitioner, and he joined in the filing of this Joint Motion for Reconsideration.

Dated: June 16, 2025

By: /s/ Rayford A. Farquhar  
RAYFORD A. FARQUHAR  
Assistant United States Attorney