

**Via ECF**

Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Centre Street, New York, NY

**Re: Khalil v. Joyce, No. 25-cv-1935**

Dear Judge Furman:

Counsel for Petitioner write on behalf of the parties in response to the Court's March 10, 2025 order directing the parties to confer and address by joint letter whether a March 12, 2025 court conference is necessary and how the Court should handle the pending petition for habeas corpus (ECF 10). The parties conferred by video link on March 11, 2025 and hereby report as follows:

1. Necessity of a Conference. The parties agree that a conference is necessary to address scheduling, as the parties do not agree on how the matter should be handled.
2. Proposed Process.
  - a. Outstanding Motion to Compel Respondents to Return Petitioner to This District. (ECF 11). Respondents take the position that the Court should resolve its anticipated Motion to Transfer or Dismiss for Improper Venue, *see infra* § 2(b), before addressing the proposed relief sought in Petitioner's Motion to Compel Respondents to Return Petitioner to This District. Petitioner's position is that the extraordinary circumstances of the case and the nature of the relief sought in that Motion authorize the Court to grant immediate relief, independent of the venue question. Respondents disagree with Petitioner's position and intend to oppose that motion, and Respondents respectfully submit that the matter of venue and jurisdiction should be resolved first, because Respondents position is that if venue is improper, this Court lacks authority to grant any relief.
  - b. Respondents' Proposed Motion to Transfer or Dismiss for Improper Venue. Absent agreement by Petitioner to consent to a transfer, Respondents intend to file a motion to transfer or dismiss the petition on the grounds that venue is not proper in the Southern District of New York, and intend to file such Motion by 11:59 p.m. on Wednesday, March 12, 2025. Petitioner agrees to file any opposition to this motion by 11:59 p.m. on Friday, March 14, 2025. Respondents agree to file any reply by 11:59 p.m. on Monday, March 17, 2025.

c. Amended Habeas Petition. Petitioner will file an amended habeas petition by 11:59 p.m. on Thursday, March 13, 2025.

Dated: March 11, 2025  
New York, NY

Respectfully submitted,

**CLEAR PROJECT  
MAIN STREET LEGAL SERVICES, INC.**

\_\_\_\_\_/s/\_\_\_\_\_  
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**CENTER FOR CONSTITUTIONAL RIGHTS**

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**DRATEL & LEWIS**

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