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April 10, 2025

**VIA ECF**

The Honorable Paula Xinis, U.S.D.J.  
United States District Court for the District of Maryland  
6500 Cherrywood Lane  
Suite 255  
Greenbelt, MD 20770

Re: Case No.: 8:25-CV-00951-PX, *Abrego Garcia et al. v. Noem et al.*  
Request for Emergency Status Conference

We write on behalf of Plaintiffs in the above-captioned case. The Supreme Court today ruled that this Court's Order Granting Preliminary Injunction, ECF 21, which directs Defendants to "facilitate and effectuate the return of Abrego Garcia to the United States," "remains in effect," other than that the deadline in the Order is no longer effective, and the term "effectuate" may require clarification. *See* Ex. A at 1-2.

Given the grave danger to Abrego Garcia's life and safety posed by his confinement and presence in El Salvador, we request that the Court schedule an immediate status conference—preferably at the Court's earliest convenience on April 11, 2025—to address the Government's compliance with this Court's Order. We further request that the Government be directed to identify and describe "the steps it has taken and the prospect of further steps" to facilitate Abrego Garcia's immediate return to the United States, Ex. A at 2, as well as the timeline for such further steps, in the event Abrego Garcia is not returned in advance of the status conference.

Also attached is a letter we sent to the Government's counsel this evening. *See* Ex. B.

Respectfully submitted,

/s/ Jonathan G. Cooper

Jonathan G. Cooper,  
MD Bar No. 21345

**quinn emanuel urquhart & sullivan, llp**

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