

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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MARIA ALEJANDRA CELIMEN SAVINO))	
and JULIO CESAR MEDEIROS NEVES,))	
))	
Petitioners-Plaintiffs,))	
))	20-cv-10617 WGY
v.))	
))	
THOMAS HODGSON, et al.,))	
))	
Respondents-Defendants.))	
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DEFENDANTS’ MOTION TO STAY FURTHER RELEASES

Respondents-Defendants hereby Move to Stay Further Releases. Because of the population reduction effected by transfers, voluntary releases and Court-ordered releases, and as a result of steps taken at the Bristol County House of Corrections (“BCHOC”), adequate social distancing is now possible in all ICE detainee units.

Should the Court be disinclined to stay the release of detainees on the basis that social distancing is practicable at BCHOC in light of the considerable reduction in the detainee population, then Defendants ask the Court to stay further release of detainees while Defendants determine whether to seek a stay from the First Circuit Court of Appeals.

As further grounds, Defendants rely on the Memorandum in Support filed herewith and the exhibits thereto.

Respectfully submitted,

ANDREW E. LELLING,
United States Attorney

By: /s/ Thomas E. Kanwit
Thomas E. Kanwit
Michael Sady
Assistant U.S. Attorneys
U.S. Attorney's Office
John J. Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100
thomas.kanwit@usdoj.gov
michael.sady@usdoj.gov

April 14, 2020

CERTIFICATE OF SERVICE

I 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).

Dated: April 14, 2020

/s/ Thomas E. Kanwit
Thomas E. Kanwit