



U.S. Department of Justice

United States Attorney's Office
District of New Jersey
Civil Division

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March 18, 2026

Via ECF

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

**Re: *Torres v. Squires*, No. 3:26-cv-01795
Request to File Letter Brief**

Dear Judge Kirsch:

This Office represents John Squires, in his official capacity as Under Secretary of Commerce for Intellectual Property and Director of the United States Patent and Trademark Office, in this case. We write in response to Plaintiff Terry Lee Torres' motion for a temporary restraining order, ECF No. 2, and supplemental letters, ECF Nos. 8-9. We respectfully request seven days to file a letter brief of no more than five pages to address the Court's jurisdiction and other threshold issues, which Torres identifies in part in his letters, before the Court takes further action on the merits.

Accordingly, our Office respectfully requests that the Court grant it until March 25, 2026 to file a responsive letter brief.

Thank you for your consideration of this matter.

Respectfully submitted,

TODD BLANCHE
U.S. Deputy Attorney General

JORDAN FOX
Chief of Staff &
Associate Deputy Attorney General
Special Attorney

s/Junis L. Baldon
JUNIS L. BALDON
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cc: Terry Lee Torres (via email)