

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NERINGA VENCKIENE)	
)	
v.)	18-CV-3061
)	
UNITED STATES)	Judge Virginia M. Kendall
)	

NOTICE OF EXTRADITION

The United States of America, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, pursuant to its treaty obligation with the Republic of Lithuania, provides notice that the United States intends to proceed with Petitioner Neringa Venckiene's extradition to Lithuania. In support of this notice, the undersigned assistant states:

1. On February 23, 2018, United States Magistrate Judge Daniel Martin issued an order certifying that Petitioner Neringa Venckiene was extraditable and committing the Petitioner to the custody of the United States Marshal pending the Secretary of State's determination regarding Petitioner's extradition and surrender to Lithuania.

2. On April 20, 2018, the United States Department of State completed its review of the Petitioner's case and pursuant to Title 18, United States Code, Section 3186, granted the Republic of Lithuania's request for extradition.

3. On April 30, 2018, Petitioner filed a Petition for a Writ of Habeas Corpus challenging the Magistrate Judge's determination and the State Department's decision to extradite her. On May 7, 2018, Petitioner moved this Court for a stay of extradition.

4. On July 12, 2018, this Court denied Petitioner's motion for a stay of extradition, *Neringa Venckiene v. United States*, 328 F.Supp. 3d 845 (N.D. Ill. 2018), finding that the Petitioner had failed to establish irreparable harm and was unlikely to succeed on the merits of her Habeas Petition.

5. On July 13, 2018, Petitioner filed a Notice of Appeal from the denial of the stay of extradition by the district court. On July 15, 2019, the United States Court of Appeals affirmed this Court's determination that Petitioner was not likely to prevail on the merits of her Habeas Petition, and its denial of Petitioner's stay of extradition. *Neringa Venckiene v. United States*, 929 F.3d 843 (7th Cir. 2019).

6. On September 4, 2019, Petitioner filed a Petition for a Writ of Certiorari with the United States Supreme Court. On September 23, 2019, Petitioner filed an application for a stay pending disposition of the Writ of Certiorari. On September 26, 2019, Petitioner's application for a stay was denied by Justice Kavanaugh. On October 15, 2019, Venckiene's Petition for a Writ of Certiorari was denied. *Neringa Venckiene, Petitioner v. United States*, No. 19-313 (October 15, 2019; United States Supreme Court).

7. On October 11, 2019, the United States Court of Appeals for the Seventh Circuit issued its Mandate. (R.31).

8. There is presently no stay in effect and the Petitioner has filed no further applications for a stay. Thus, there are no legal barriers remaining to her prompt surrender to the Republic of Lithuania and the United States intends to surrender the Petitioner to the Republic of Lithuania forthwith.

9. Once the Petitioner is surrendered, her habeas petition is moot. *Lindstrom v. Graber*, 203 F.3d 470,474 (7th Cir. 2000); *Qassim v. Bush*, 466 F.3d 1073, 1075 (D.C.Cir. 2006).

Dated: October 15, 2019

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

By: /s/ Terry M. Kinney
Terry M. Kinney
Assistant United States Attorney
219 S. Dearborn Street, Rm. 500
Chicago, Illinois 60604
(312) 353-1931