

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHI HUAN DONG,

Petitioner,

v.

JUDITH C. ALMODOVAR, *et al.*,

Respondents.

Case No. 25 Civ. 7630 (JPC)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the government respectfully submits this Return, together with the accompanying Memorandum of Law in Opposition to the Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner Shi Huan Dong, and the Declaration of Hal S. Waters dated October 1, 2025 (ECF No. 6). The attached documents are taken from Shi Huan Dong’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement.

1. Exhibit A is a copy of the Notice to Appear, dated February 11, 2011, and served on Shi Huan Dong on February 14, 2011.

2. Exhibit B is a copy of the Order of the Immigration Judge dated December 13, 2011, denying Shi Huan Dong’s application for asylum and withholding of removal, and ordering Shi Huan Dong removed to China.

3. Exhibit C is a copy of the May 22, 2014, Order of the Board of Immigration Appeals (“BIA”) dismissing Shi Huan Dong’s appeal of the Immigration Judge’s order of removal and the denial of his application for asylum and withholding of removal.

4. Exhibit D is a copy of the Form I-205 Warrant of Removal, dated September 14, 2025.

The facts contained in Exhibits A through D, and in the October 1, 2025, Declaration of Deportation Officer Hal S. Waters, and the law set forth in the government's Memorandum of Law in Opposition to the Petition, establish that Shi Huan Dong's detention is lawful.

WHEREFORE, the government respectfully requests that the Court enter judgment denying the Petition.

Dated: New York, New York
October 1, 2025

Respectfully submitted,

JAY CLAYTON
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Southern District of New York
Attorney for Respondents

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