

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

JIANDONG WU,

Petitioner,

v.

JUDITH C. ALMODOVAR, *et al.*,

Respondents.

Case No. 25 Civ. 8968 (GHW)

**RETURN TO AMENDED
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 Jiandong Wu, and the Declaration of Sarwar Hussain dated November 13, 2025 (ECF No. 6). The attached documents are taken from Jiandong Wu’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 Form I-200 Warrant for Arrest of Alien, dated September 22, 2023.
2. Exhibit B is a copy of the Notice to Appear, dated September 22, 2023.
3. Exhibit C is a copy of the Form I-220A Order of Release on Recognizance, dated September 22, 2023.
4. Exhibit D is a copy of the Form I-286 Notice of Custody Determination, dated September 22, 2023.
5. Exhibit E is a copy of the Form I-200 Warrant for Arrest of Alien, dated October 29, 2025.

6. Exhibit F is a copy of the INA Section 236(a) Initial Custody Determination, dated October 29, 2025.

7. The facts contained in the November 13, 2025, Declaration of Deportation Officer Sawar Hussain and the law set forth in the government's Memorandum of Law in Opposition to the Petition, establish that Jiandong Wu's detention is lawful.

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

Dated: New York, New York
November 13, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for Respondents

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