



10 High Street, Suite 3
Medford, MA 02155
Tel: (617) 245-8090
Fax: (617) 245-8088
www.brookslawfirm.com

Arinda R. Brooks, *Founder*
Albert Ngo, *Partner & COO*

Vitoria Guimaraes, *Partner*

The Honorable Elizabeth A. Wolford
Chief United States District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, New York 14614

Re: Ahmed v. Lyons, et al.
25-CV-06662-EAW

Dear Chief Judge Wolford:

Petitioner respectfully submits this reply to Respondent's letter filed earlier today. Petitioner is opposed to a 45-day deadline to respond to the instant Petition. Under 28 U.S.C. § 2243, the Court, upon receipt of a petition for writ of habeas corpus is directed to "forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto." 28 U.S.C. § 2243. The statute further provides that the person to whom the order to show cause is directed shall make a return certifying the true cause of the detention within three days, unless good cause warrants additional time. Petitioner is not opposed to a reasonable extension of the return date but respectfully requests that a response be ordered within 7 days. Petitioner was suddenly detained on a military base while visiting his brother without any cause, is a father to U.S. Citizen children, and is presently incarcerated in a federal correctional facility. His child had a surgical procedure today that he was unable to be present for. He has a strong interest in resolving the legality of detention in accordance with the expedited time frame provided by the statute.



10 High Street, Suite 3
Medford, MA 02155
Tel: (617) 245-8090
Fax: (617) 245-8088
www.brookslawfirm.com

Arinda R. Brooks, *Founder*
Albert Ngo, *Partner & COO*

Vitoria Guimaraes, *Partner*

Respondents suggest that Petitioner is subject to expedited removal because he was “encountered at the border within 100 miles within 14 days of entry,” however their own I-213 Record confirms that Petitioner has been present since 2016. It is also not accurate that his removal proceedings “were interrupted by covid and never resumed.” Rather it appears that Petitioners’ removal proceedings were pending review by the Bord of Immigration Appeals, and that Petitioner has submitted a motion to remand those proceedings in light of an approved I-130 Petition for alien relative filed by his spouse. Documents conforming this are attached as exhibits to the Petition.

Respondents’ shifting and contradictory understanding of the basis of Petitioner’s detention, calls for prompt resolution. It appears uncontested that he has been present in the United States since 2016 and was recently apprehended in the United States without any process prior to the deprivation of his liberty or due to any violation of law or condition of his release. Petitioner therefore contends that the only basis for his detention is 8 USC 1226 (a). Nevertheless, given the facts of this case. Petitioner is not opposed to further briefing and reasonable enlargement of time to respond.

Dated: November 18, 2025

Respectfully submitted,
/s/Carl Hurvich/s/
Carl Hurvich, Esq.
Brooks Law Firm
10 High Street, Ste. 3
Medford, MA 02155
(617) 245-8090
Carl@BrooksLawFirm.com
Counsel for Petitioner



10 High Street, Suite 3
Medford, MA 02155
Tel: (617) 245-8090
Fax: (617) 245-8088
www.brookslawfirm.com

Arinda R. Brooks, *Founder*
Albert Ngo, *Partner & COO*

Vitoria Guimaraes, *Partner*

Encl: medical record