UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZHEN LIN,

Petitioner,

v.

JUDITH ALMODOVAR, Field Office Director of Enforcement and Removal Operations, *et al.*,

Respondents.

No. 25 Civ. 9639 (MKV)

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 ECF No. 1 ("Petition"), and the Declaration of Acting Supervisory Detention and Deportation Officer Mincheol So, dated December 3, 2025. The attached documents are taken from Petitioner's administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement ("ICE"). The below exhibits are true and correct copies of these documents maintained by ICE.

1. Exhibit 1 is a Form I-213, Record of Deportable/Inadmissible Alien, dated November 13, 2024, with the FBI Number redacted by counsel.

2. Exhibit 2 is a Form I-862, Notice to Appear, dated December 13, 2024.

3. Exhibit 3 is an Interim Notice Authorizing Parole, dated December 16, 2024.

4. Exhibit 4 is a Form I-286, Notice of Custody Determination, dated December 17, 2024.

5. Exhibit 5 is a Form I-200, Warrant for Arrest of Alien, dated November 18, 2025.

6. Exhibit 6 is a notice from Kenneth Genalo, ICE Field Office Director, to Petitioner, re: Parole Revoke of Lin, Zhen [redacted], dated December 2, 2025.

The facts contained in Exhibits 1 through 6, and in the So Declaration, and the law set forth in the Government's memorandum of law in opposition to the Petition, establish that Petitioner's detention is lawful.

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

Dated: New York, New York
December 3, 2025

Respectfully submitted,

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

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