



December 1, 2025

VIA ECF

Hon. J. Paul Oetken  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Ke Dian Wang v. Francis, et al.*, No. 25-CV-09830 (JPO)

Dear Judge Oetken:

Through counsel, Petitioner Ke Dian Wang (“Mr. Wang”) and the Respondents respectfully submit this joint letter advising the court of jurisdiction.

On November 25, 2025, Mr. Wang, through counsel, filed a petition for writ of habeas corpus pursuant to 28 U.S.C. § 2241. At the time, counsel was unable to confirm Mr. Wang’s location and believed him to be in the Southern District of New York. On November 26, 2025, this Court issued an Order to Show Cause, requiring a joint letter from the parties to confirm, amongst other things, Mr. Wang’s location at the time of filing.

On November 30, 2025, Respondents’ counsel confirmed with the Respondents that Mr. Wang had left the Southern District of New York for the District of New Jersey on November 24, 2025 and at the time of the habeas filing, he was in the District of New Jersey at the Delaney Hall Detention Facility in Newark, New Jersey.

Petitioner would formally request this Court transfer this case to the District of New Jersey, where it appropriately sits. Respondents’ counsel have consented to this transfer. Petitioner would request this Court waive the seven-day waiting period in Local Civil Rule 83.1, which the Respondents’ also consented to, as Mr. Wang is detained. It is the parties’ understanding that, **per *Chrysler Credit Corp. v Country Chrysler, Inc.*, the rulings made by the transferor court are binding on the transferee court.** 928 F.2d 1509 (1991). On this basis, this Court’s Order to Show Cause, particularly the order requiring the Petitioner to remain in the SDNY, EDNY, or District of New Jersey during pendency of these proceedings remains in effect with this transfer.

As this case should be transferred to the District of New Jersey, there is no need for today’s 3:00 PM hearing.

Respectfully Submitted,

/s/ Lauren N. Kostas

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*Pro Bono Counsel for Petitioner*

cc: Respondents' counsel of record (via ECF)