



U.S. Department of Justice
United States Attorney
Eastern District of Pennsylvania

Neelima Vanguri
Assistant United States Attorney
Direct: (215) 861-8334
neelima.vanguri@usdoj.gov

615 Chestnut Street, Suite 1250
Philadelphia, PA 19106-4476
(215) 861-8200

December 31, 2025

VIA ECF:

Honorable Joshua Wolson
Judge, United States District Court
United States Courthouse
601 Market Street
Philadelphia, PA 19106-1744

RE: *Zafar Saidov v. David O'Neill et al.*,
E.D. Pa. Civ. No. 25-cv-7360

Dear Judge Wolson:

Respondents submit this letter brief in accordance with this Court's December 30, 2025 Order. The Court directed Respondents to advise by noon today whether they oppose the petition and whether they intend to make arguments other than those raised in *Kashranov v. J.L. Jamison*, Case No. 2:25-cv-05555-JDW, 2025 WL 3188399 (E.D. Pa. Nov. 14, 2025).

Respondents concede this matter is legally and factually similar to *Kashranov* and approximately 46 other cases in this district that have been decided against the government to date. Respondents respectfully submit that their positions are correct and therefore—despite the weight of contrary decisions in this district and nationwide—incorporate the arguments made in *Kashranov* into this letter brief to preserve them for appeal (if ultimately authorized by the Solicitor General).

Thank you for your consideration.

Sincerely,

DAVID METCALF
United States Attorney

/s/ Neelima Vanguri
NEELIMA VANGURI
Assistant United States Attorney

cc: Christopher Casazza, Esq. (chris@piclaw.com)
Counsel for Petitioner