UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

ALBERT NORMATOV, Petitioner(s) v. LADEON FRANCIS, Acting Field Office Director of New York, Immigration Customs and Enforcement; TODD LYONS, Acting Director, U.S. Immigrations and Customs Enforcement; PAMELA BONDI, U.S. Attorney General; and KRISTI NOEM, U.S. Secretary of Homeland Security Respondents(s).	)	Case No. 1:26-cv-00095-NJC

PETITIONER'S SUPPLEMENTAL BRIEFING ON *ZHANG V. GENALO*

This briefing on *Zhang v. Genalo*, No. 25-CV-06781 (NRM), 2025 WL 3733542 (E.D.N.Y. Dec. 28, 2025) is respectfully submitted in response to Honorable Judge Choudhury's request for supplemental briefing in the Order filed January 17, 2026 at 7:58 PM EST.

Petitioner did not address *Zhang v. Genalo* in Reply because the Government's reasoning in *Zhang v. Genalo* was presented accurately by Respondents in their Response. *See* Dkt. 25, pg. 3, fn. 2. The factual inaccuracies addressed in Petitioner's Reply concern facts that are not easily accessible to this Court. Additionally, Petitioner noted the section 241.4(l)(2) authorization rule in the Petition, Dkt. 1, ¶ 7a, and Respondent stated OSUP revocation by an Assistant Field Director has warranted release in this Circuit, Dkt. 25, pg. 3, fn. 2. Petitioner respected whether the Court chose to apply Circuit precedent to this matter without comment.

Petitioner believes that he succeeds on the merits applying either the *Zhang v. Genalo* rule or the *Matthews v. Eldridge* balancing test. Petitioner respects and appreciates Honorable Judge

Choudhury's consideration of *Zhang v. Genalo* (E.D.N.Y. Dec. 28, 2025); *Roman-Cruz v. Lyons*, No. 25-cv-10522, 2026 WL 114936 (S.D.N.Y. Jan. 15, 2026); and *Funes v. Francis*, No. 25-cv-7429, 2025 WL 3263896 (S.D.N.Y. Nov. 24, 2025) in this matter.

Petitioner requests his swift release from detention by Immigration and Customs Enforcement because he has been deprived of his Right to Due Process under the 5th Amendment of the United States Constitution.

Petitioner does not request or require a hearing in this matter, unless so ordered by the Court.

Thank you for your consideration and attentiveness in this matter.

Dated this 18th day of January, 2026.

Respectfully submitted,

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