



**U.S. Department of Justice**  
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January 12, 2026

**VIA ECF:**

Honorable Joshua D. Wolson  
Judge, United States District Court  
3809 United States Courthouse  
601 Market Street  
Philadelphia, PA 19106-1744

RE: *Brayan Feliz Polanco v. Jamison et al.*,  
E.D. Pa. Civ. No. 26-cv-0122

Dear Judge Wolson:

Respondents submit this letter brief in accordance with this Court's January 9, 2026 Order. [ECF #2]. The Court directed Respondent's to inform the Court if they: 1) oppose the petition, 2) whether they intend to make arguments other than those in *Kashranov v. J.L. Jamison*, Case No. 2:25-cv-05555-JDW, 2025 WL 3188399 (E.D. Pa. Nov. 14, 2025).

Respondents do oppose the petition. However, Respondents' also concede that this matter is legally and factually similar to *Kashranov*. Respondents in this case respectfully remain of the view that their positions in *Kashranov* are correct and therefore—despite the weight of contrary decisions in this District—incorporate the arguments made in that case and other cases into this letter brief in order to preserve them for appeal (if ultimately authorized by the Solicitor General).

Thank you for your consideration.

January 5, 2026  
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Respectfully,

DAVID METCALF  
United States Attorney

/s/ Anthony St. Joseph  
ANTHONY ST. JOSEPH  
Assistant United States Attorney

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Counsel for Petitioner