IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ALAN GAGIEV,	:	
	:	
Petitioner,	:	
	:	
v.	:	Civil Action No. 26-169-JFM
	:	
MICHAEL ROSE ET AL.,	:	
	:	
Respondents.	:	

SUPPLEMENT TO RESPONDENTS' FEBRUARY 24, 2026 FILING (ECF NO. 12)

Respondents submit this supplement to provide the Court additional information related to the Court's questions directed to the government in the Court's February 17, 2026 Order (ECF No. 9). This supplement is to clarify representations made by the government related to Petitioner Alan Gagiev's parole both in its February 24, 2026 response (ECF No. 12) to the February 17, 2026 Order and its February 13, 2026 Letter Regarding Documentation (ECF No. 8). On February 24, 2026, Petitioner filed a declaration stating that after his entry, he was given an I-94 parole document that provided a two-year expiration period. *See* ECF No. 13-1, ¶ 2.

Respondents previously informed the Court that Petitioner's parole expired on April 18, 2025 (*see* ECF Nos. 8, 12), as reflected on the I-94 that Petitioner submitted to the Court with his petition for writ of habeas corpus (ECF No. 1-3, Exhibit B). Respondents maintain that this is the operative date for the expiration of Petitioner's parole. Nonetheless, Respondents are attaching as Exhibit A an I-94

for Petitioner with an "Admit until" date of December 29, 2026. Petitioner attached this version of the I-94 as support for his application for relief from removal in June 2025. However, USCIS denied Petitioner's I-765 employment authorization application on May 30, 2025 because of his "parole [being] expired or [] terminated." *See* Exhibit B, I-765 Notice of Denial. Petitioner's parole expiration date of April 18, 2025 is currently reflected on U.S. Customs and Border Protection's (CBP) I-94 website.[1]

Petitioner appears to have previously been provided with an I-94 having an "Admit until" date of December 29, 2026, which was canceled on or about April 11, 2025, pursuant to a Notice of Parole Termination sent to certain individuals previously paroled into the United States.[2] At that time, Petitioner's parole was updated to its current, operative date of April 18, 2025, as previously represented in Respondents' filings and on the CBP website.

Respondents continue to seek confirmation that Petitioner was notified of the change in his parole status at the time it occurred. Petitioner was made aware that his parole was terminated when USCIS denied his application for employment authorization on May 30, 2025.

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[1] CBP, Get Most Recent I-94/I-95, https://i94.cbp.dhs.gov/search/recent-search.
[2] *See generally* ASAP, *Sample Notice Ending CBP One Parole*, https://asaptogether.org/en/cbpone-parole-end-notice/ (last visited March 5, 2026); Jackson Lewis, Immigration Blog, *DHS Revokes Legal Status, Sends Parole Termination Notices to CBP One App Users in United States* (April 16, 2025), https://www.globalimmigrationblog.com/2025/04/dhs-revokes-legal-status-sends-parole-termination-notices-to-cbp-one-app-users-in-united-states/.

Respectfully submitted,

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Dated: March 6, 2026

Counsel for Respondents

CERTIFICATE OF SERVICE

I certify that on this date, I filed the foregoing Supplement to Respondents' February 24, 2026 Filing (ECF No. 12) via the Court's CM/ECF System, thereby making it available for viewing and download for all parties to the case.

/s/ Alanna N. Pawlowski

Dated: March 6, 2026

ALANNA N. PAWLOWSKI
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