

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

TIANQIANG HUANG,)	
<i>Plaintiff,</i>)	
)	
v.)	
)	Case No.:
PAMELA JO BONDI,)	
Attorney General: Senior Official of U.S Dept. of Justice,)	
KRISTI NOEM,)	
Secretary of U.S. Dept. of Homeland Security,)	
TODD M. LYONS,)	
Director of U.S Immigration and Customs Enforcement,)	
ROBERT CERNA,)	
Acting Field Office Director of ICE and Removal Operations,)	
SCARLET GRANT,)	
Warden of Cimarron Correctional Facility,)	
<i>Defendants</i>)	
)	

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

Tianqiang Huang (“Petitioner”) is a 50-year-old citizen and national of the People’s Republic of China (“China”) who has been detained by U.S. Immigration and Customs Enforcement (“ICE”) at the Cimarron Correctional Facility, located at 3200 S. Kings Highway, Cushing, Oklahoma 74023.

On December 13, 2024, an Immigration Judge ordered Petitioner removed to China pursuant to the charges contained in the Notice to Appear (“NTA”) (see Exhibit 3) and denied Petitioner’s applications for asylum, withholding of removal and Convention Against Torture (see Exhibit 1). On January 8, 2025, Petitioner filed an appeal of the above order to the Board of Immigration Appeals (“BIA”), the appeal remains pending (see Exhibit 2).

Petitioner’s detention has become indefinite and violates the Due Process Clause of the Fifth Amendment. Absent intervention by this Court, Petitioner faces continued detention without a definite end date or meaningful process. Accordingly, to vindicate Petitioner’s constitutional

rights, this Court should grant the *Petition for a Writ of Habeas Corpus*, find that Petitioner Tianqiang Huang is being unlawfully detained, and order his immediate release from ICE custody or schedule a bond hearing within a designated time by this Court.

JURISDICTION

1. This action arises under the Constitution of the United States Fifth Amendment and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*
2. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question). This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et. seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.
3. This Court has habeas corpus jurisdiction to consider the statutory and constitutional grounds for immigration detention that are unrelated to a final order of removal. *See Demore v. Kim*, 538 U.S. 510, 517-18, 123 S. Ct. 1708, 155 L. Ed. 2d 724 (2003).
4. 8 U.S.C. § 1252(g) cannot limit this Court's jurisdiction to hear "any cause or claim by or on behalf of any alien arising from the decision or action by [DHS] to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter." (the Supreme Court requires § 1252(g) to be read narrowly and applied only "to those three specific actions themselves." *Jennings v. Rodriguez*, 583 U.S. 281, 294-95, 138 S. Ct. 830, 200 L. Ed. 2d 122 (2018). Here, Petitioner challenges "the narrow legal question of whether [his] detention under § 1225 violates the INA and whether he is entitled to a bond hearing under § 1226's discretionary detention framework." *Mendoza Gutierrez v. Baltasar*, No. 1:25-CV-2720-RMR, 2025 WL 2962908, at *3 (D. Colo. Oct. 17, 2025). Because Petitioner does not challenge Respondents' decision to commence or adjudicate proceedings or execute removal orders, § 1252(g) does not jurisdictionally bar his Petition. *Escarcega v. Olson*, No. CIV-25-1129-J, 2025 U.S. Dist. LEXIS 228528, at *3 (W.D. Okla. Nov. 20, 2025)

VENUE

5. The Venue is proper because the Petitioner is detained at the Cimarron Correctional Facility, located at 3200 S. Kings Highway, Cushing, Oklahoma 74023, which is within the jurisdiction of this District.
6. The Venue is proper in this District because the Respondents are officers, employees, or agencies of the United States, and the Respondent, the Cimarron Correctional Facility, is located in this District and a substantial part of the events or omissions giving rise to the Petitioner's claims occurred in this District and the Petitioner resides in this District and no real property is involved in this action. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. § 2243

7. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).
8. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

9. Petitioner Tianqiang Huang is a citizen and national of the People's Republic of China. Petitioner is currently detained at the Cimarron Correctional Facility, and is in the custody and under the direct control of Respondents and their agents.
10. Respondent Pamela Jo Bondi (hereinafter "Respondent Bondi") is sued in her official capacity as Attorney General of the United States and the Senior Official of the U.S. Department of Justice ("DOJ"). In this capacity, Respondent Bondi oversees the Executive Office for

Immigration Review (“EOIR”), which administers the immigration courts and the Board of Immigration Appeals (“BIA”), and exercises authority over immigration adjudications. Respondent Bondi is a legal custodian of Petitioner.

11. Respondent Kristi Noem (hereinafter “Respondent Noem”) is sued in her official capacity as Secretary of the U.S. Department of Homeland Security (“DHS”). In this role, Respondent Noem is responsible for the administration and enforcement of the Immigration and Nationality Act and oversees ICE, the component agency responsible for Petitioner’s detention and custody. Respondent Noem is a legal custodian of Petitioner.

12. Respondent Todd M. Lyons (hereinafter “Respondent Lyons”) is sued in his official capacity as the Director of U.S. Immigration and Customs Enforcement. In this role, Respondent Lyons exercises nationwide supervisory authority over ICE detention operations and policies, including those governing Petitioner’s detention and release. Respondent Lyons is a legal custodian of Petitioner.

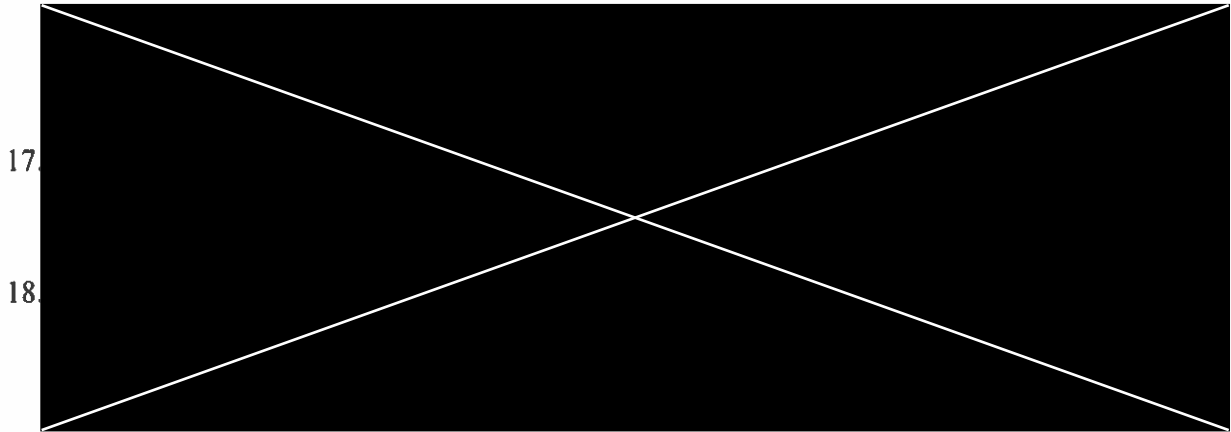
13. Respondent Robert Cerna (hereinafter “Respondent Cerna”) is sued in his official capacity as the Acting Field Office Director of ICE Enforcement and Removal Operations (“ERO”), Dallas Field Office. In this role, Respondent Cerna exercises direct authority over Petitioner’s detention and potential release. Respondent Cerna is a legal custodian of Petitioner.

14. Respondent Scarlet Grant (hereinafter “Respondent Grant”) is sued in her official capacity as the Warden of the Cimarron Correctional Facility. In this role, Respondent Grant oversees the daily operation of the detention facility where Petitioner is confined and exercises immediate authority over the conditions and continuation of Petitioner’s physical detention. Respondent Grant is a legal custodian of Petitioner.

STATEMENT OF FACTS

15. Petitioner Tianqiang Huang is a 50-year-old citizen and national of the People’s Republic of China, born on [REDACTED] with Alien Registration Number A [REDACTED]

16. On or about July 16, 2017, Petitioner's friend, Mr. Jianjin Huang, introduced Petitioner to the



17.
18.
19. On or about July 11, 2018, Petitioner entered the United States without inspection through the U.S.–Mexico border for the purpose of seeking asylum.

20. On or about June 17, 2019, Petitioner filed Form I-589, Application for Asylum, Withholding of Removal, and relief under the Convention Against Torture (“CAT”), with the Asylum Office of USCIS.

21. On or about August 8, 2019, the Department of Homeland Security (“DHS”) served Petitioner with a Form I-862, Notice to Appear (“NTA”), charging him with removability pursuant to INA § 212(a)(6)(A)(i) (see Exhibit 3).

22. On or about July 11, 2023, Petitioner appeared in an individual hearing before the Immigration Court and testified in support of his applications for relief.

23. On December 14, 2024, at the Immigration Court located in New York, the Immigration Judge denied Petitioner’s application for asylum, withholding removal under INA § 241(b)(3) and denied relief under the CAT (see Exhibit 1).

24. On January 8, 2025, Petitioner filed an appeal of that decision to the BIA, which remains pending as of the date of filing of this Petition (see Exhibit 2).

25. The ICE detained the Petitioner on December 8, 2025, during a traffic stop while the Petitioner drove to visit his friend in Oklahoma City, Oklahoma. And he was told by the ICE officer that he is and will be detained pending appeal to be adjudicated by the BIA.

26. Despite the pending appeal, Petitioner remains detained by the U.S. Immigration and Customs Enforcement (“ICE”) at the Cimarron Correctional Facility, located at 3200 S. Kings Highway, Cushing, Oklahoma 74023.
27. Petitioner has no criminal history and has never been charged with, convicted of, or accused of any criminal misconduct, other than his entry into the United States for the purpose of seeking asylum and at most a traffic violation.
28. Upon information and belief, Petitioner’s continued detention serves no legitimate immigration purpose.
29. Upon information and belief, Petitioner’s detention has become unreasonable, indefinite, and punitive, in violation of the Due Process Clause of the Fifth Amendment.
30. Upon information and belief, the Petitioner, as a noncitizen who has lived in the United States for 7 years and was not apprehended at or near the border cannot be considered to be 'seeking admission' under § 1225(b)(2)(A), and therefore § 1226 governs their detention, entitling them to a bond hearing.
31. Accordingly, Petitioner respectfully requests that this Court grant the *Petition for a Writ of Habeas Corpus* and order Respondents to release him from custody immediately or provide a bond hearing for Respondent.

SUMMARY OF ARGUMENT

32. While Petitioner timely filed an appeal of the immigration judge's Order denying his requested relief on January 8, 2025, that appeal remains pending. As a result of the pending appeal, Petitioner cannot be removed to China, the country of his nationality and birth. Petitioner’s continued detention therefore serves no legitimate immigration purpose and has become indefinite. Under the Due Process Clause of the Fifth Amendment, prolonged immigration detention without a realistic prospect of removal is unconstitutional.
33. The Petitioner is a 50-year-old noncitizen who has lived in the United States for more than 7 years before being detained by ICE in December 2025. The Petitioner was not apprehended at

or near the border and cannot be considered to be 'seeking admission' under § 1225(b)(2)(A), and therefore § 1226 governs their detention, entitling them to a bond hearing.

34. The Petitioner is in custody in violation of the Constitution or laws or treaties of the United States. 28 U.S.C. § 2241(c)(3). Specifically, he is being improperly detained pursuant to 8 U.S.C. § 1225(b) in violation of his due process rights, and he is instead entitled to release or an immediate bond hearing under 8 U.S.C. § 1226. Further, an award of reasonable costs and attorney's fees is warranted under the Equal Access to Justice Act ("EAJA").
35. Accordingly, this Court should grant the *Petition for a Writ of Habeas Corpus* and order Respondents to provide the Petitioner with a bond hearing or release the Petitioner immediately from ICE custody.

CLAIM FOR RELIEF

Count I. Violation of Fifth Amendment Right to Due Process

36. The Petitioner realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.
37. The Petitioner claims that his continued detention by immigration authorities is improper. To obtain habeas corpus relief, the Petitioner must demonstrate that he is "in custody in violation of the Constitution or laws or treaties of the United States." *See* 28 U.S.C. § 2241(c)(3). In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court construed § 1231(a)(6) to avoid serious constitutional concerns, holding that the statute does not authorize indefinite detention. Detention becomes unconstitutional when "there is no significant likelihood of removal in the reasonably foreseeable future." This interpretation was reaffirmed in *Clark v. Martinez*, 543 U.S. 371, 384 (2005), which held that § 1231(a)(6) must be read consistently across all covered noncitizens and cannot be construed to permit indefinite detention.
38. Here, the Petitioner's detention has no end in sight. Although the Immigration Judge denied the Petitioner's application for withholding of removal under the Convention Against Torture. Petitioner has timely filed an appeal on January 8, 2025, and that appeal remains pending. As a result of the pending appeal, Petitioner cannot be removed to China, the country of his

nationality and birth. Despite the absence of any present authority to remove Petitioner's continued detention, it therefore serves no legitimate immigration purpose and has become indefinite.

39. Because there is no realistic prospect of removal to any third country in the reasonably foreseeable future, and serves no legitimate immigration purpose, such detention is unreasonable, indefinite, and punitive. While the Government has not taken any concrete action on the pending appeal, continued detention will not serve any meaningful immigration purpose except increasing costs to the U.S. Government for such detention. Therefore, the Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment, which warrants this Court to grant the Petition and order the Respondents to release the Petitioner from custody immediately.

Coun II. Respondents violated INA because 8 U.S.C. § 1225's mandatory detention provision does not apply but § 1226 governs the Petitioner's detention.

40. This petition presents an issue that has become common in the District Courts. The Immigration Nationality Act ("INA") "contemplates two detention regimes for noncitizens pending removal proceedings." *Salazar v. Dedos*, [No. 25-835-DHU-JMR, 2025 U.S. Dist. LEXIS 183335, 2025 WL 2676729, at *3 (D.N.M. [Sept. 17, 2025]); see *Jennings v. Rodriguez*, 583 U.S. 281, 289, 138 S. Ct. 830, 200 L. Ed. 2d 122 (2018). The first detention regime provides that when "an applicant for admission" is "seeking admission" and "not clearly and beyond a doubt entitled to be admitted," the noncitizen "shall be detained" for removal proceedings. 8 U.S.C. § 1225(b)(2)(A). This provision "mandates detention" and affords no bond hearing. *Salazar*, 2025 U.S. Dist. LEXIS 183335, 2025 WL 2676729, at *3. The second detention regime authorizes the arrest and detention "on a warrant issued by the Attorney General" of noncitizens "pending a decision on whether [they are] to be removed." 8 U.S.C. § 1226(a). "Under federal regulations, noncitizens detained under" this second detention regime "are entitled to individualized bond hearings at the outset of detention." *Salazar*, 2025 U.S. Dist. LEXIS 183335, 2025 WL 2676729, at *3 (citing 8 C.F.R. §§ 236.1(d)(1), 1236.1(d)(1)). *Garcia-Lopez v. Dora Castro, Warden, Otero City. Processing Ctr.*, No. 25-1144 JB/SCY, 2025 U.S. Dist. LEXIS 266489, at *3-4 (D.N.M. Dec. 29, 2025). (Internal citation omitted)

41. This case is among a growing number of challenges to the Government's policy of reclassifying long-term noncitizen residents in the United States as individuals "seeking admission" [*5] under 8 U.S.C. § 1225. Historically, "the line drawn . . . is that §1225 governs detention of non-citizens 'seeking admission into the country,' whereas §1226 governs detention of non-citizens 'already in the country.'" *Martinez v. Hyde*, 792 F. Supp. 3d 211, 2025 WL 2084238, at *8 (D. Mass.) (citing *Jennings*, 583 U.S. at 288-89). Recently, however, ICE has detained long-term residents under §1225(b)(2)(A), thereby subjecting them to mandatory detention. *See Romero*, 795 F. Supp. 3d 271, 2025 WL 2403827, at *1 (collecting cases). *Pu Sacvin v. De Anda-Ybarra*, No. 2:25-CV-01031-KG-JFR, 2025 U.S. Dist. LEXIS 224815, 2025 WL 3187432, at *1, *2 (D.N.M. Nov. 14, 2025). *Garcia-Lopez v. Dora Castro, Warden, Otero Cty. Processing Ctr.*, at *4-5 (D.N.M. Dec. 29, 2025).
42. Indeed, the Supreme Court has held that once a noncitizen is within the United States, "Section 1226 generally governs the process of arresting and detaining that group of aliens pending their removal." *Jennings v. Rodriguez*, 583 U.S. 281, 288, 138 S. Ct. 830, 200 L. Ed. 2d 122 (2018). *Garcia-Lopez v. Dora Castro, Warden, Otero Cty. Processing Ctr.*, No. 25-1144 JB/SCY, 2025 U.S. Dist. LEXIS 266489, at *5-6 (D.N.M. Dec. 29, 2025).
43. When interpreting a statute, a court's analysis must begin with the text of the statute itself. *Potts v. Ctr. For Excellence in Higher Educ., Inc.*, 908 F.3d 610, 613 (10th Cir. 2018). Section 1225(b)(2)(A) provides: in the case of an alien who is an applicant for admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229(a) of this title. 8 U.S.C. § 1225(b)(2)(A).
44. Respondents might insist that § 1225(b)(2)(A) controls because Petitioner is an "applicant for admission" and the section unambiguously requires all "applicant[s] for admission" to be subject to mandatory detention. While agreeing that the section is unambiguous, the Court notes that the plain language of § 1225(b)(2)(A) requires an "applicant for admission" to also be "seeking admission" for the section to control. *See Loa Caballero v. Baltazar*, No. 1:25-CV-3120-NYW, 2025 U.S. Dist. LEXIS 208290, 2025 WL 2977650, at * 4 (D. Colo. Oct. 22, 2025). Respondents then suggest that all "applicants for admission" are "seeking admission."

But if all "applicants for admission" are also "seeking admission," then § 1225(b)(2)(A)'s inclusion of the phrase "seeking admission" would be redundant and courts should avoid statutory interpretations that "make[] any part [of the statute] superfluous." *Fuller v. Norton*, 86 F.3d 1016, 1024 (10th Cir. 1996).

45. Further, based on the plain language of § 1225(b)(2)(A), the phrase "seeking admission" only applies to noncitizens who "[are] presently and actively seeking lawful entry into the United States . . . at the border." *Loa Caballero*, 2025 U.S. Dist. LEXIS 208290, 2025 WL 2977650, at * 4 (noting that a noncitizen already present in the United States is not "seeking admission or lawful entry at that point—one would say that they had entered unlawfully but now seek a lawful means of remaining there" (cleaned up)); *see also Hernandez v. Baltazar*, No. 1:25-CV-3094-CNS, 2025 U.S. Dist. LEXIS 210449, 2025 WL 2996643, at *5 (D. Colo. Oct. 24, 2025) ("For a noncitizen to be deemed seeking admission, they must be currently taking active steps to seek lawful entry into the U.S.") (cleaned up); *Pu Sacvin v. Ybarra*, No. 2:25-CV-1031-KG, 2025 U.S. Dist. LEXIS 224815, 2025 WL 3187432, at *3 (D. N.M. Nov. 14, 2025) ("Noncitizens seeking admission are those who have not effected an entry into the United States.") (cleaned up). The Court's statutory construction is further supported by the Supreme Court in *Jennings*: "U.S. immigration law authorizes the Government to detain certain aliens seeking admission into the country under §§1225(b)(1) and (b)(2) [and to] detain certain aliens [*6] already in the country pending the outcome of removal proceedings under §§ 1226(a) and (c)." 583 U.S. at 289 (cleaned up). Accordingly, based on § 1225(b)(2)(A)'s plain language, the Court concludes that the section only applies when a noncitizen "applicant for admission" is actively "seeking admission" into the United States. *Escarcega v. Olson*, at *4-6 (W.D. Okla. Nov. 20, 2025). (Internal citation omitted and alerted)

46. As in many other cases, Respondents might rely on "the recent precedential decision by the Board of Immigration Appeals ("BIA") in *Matter of Yajure Hurtado*," when arguing that Section 1225(b)(2)(A) is applicable. Doc. 11 at 2 (citing 29 I. & N. Dec. 216 (BIA 2025), Interim Decision 4125, 2025 WL 2674169). However, "the agency's interpretation carries only the 'power to persuade,' and most district courts have rejected *Hurtado* as inconsistent with the INA's text." *Pu Sacvin*, 2025 U.S. Dist. LEXIS 224815, 2025 WL 3187432, at *3 (quoting

Loper Bright Enters. v. Raimondo, 603 U.S. 369, 402, 144 S. Ct. 2244, 219 L. Ed. 2d 832 (2024)); The Supreme Court recently directed district courts that they 'must exercise independent judgment in determining the meaning of statutory provisions' and 'may not defer to an agency interpretation of the law simply because a statute is ambiguous.'" *Loper Bright Enters.*, 603 U.S. at 394. (internal citation omitted).

47. Here, the Petitioner has been present and living in the United States for more than 7 years, and ICE did not apprehend him at or near the border. Accordingly, §1225's mandatory detention provision does not apply because the Petitioner already effected an entry into the United States by living here for 7 years.

48. Having found § 1225(b)(2)(A) inapplicable to Petitioner, the Court concludes that § 1226(a) controls his detention. *See Loa Caballero*, 2025 U.S. Dist. LEXIS 208290, 2025 WL 2977650, at * 4 ("The Court joins the numerous courts across the country that have held that [noncitizens not apprehended at the border, who have been present in the United States for many years without lawful status] are subject to the discretionary detention framework of § 1226(a)"); *see also* R&R at 22-23 (collecting cases). Noncitizens detained under § 1226(a) are generally entitled to a prompt bond hearing before an immigration judge. *See Hernandez*, 2025 U.S. Dist. LEXIS 210449, 2025 WL 2996643, at *8 (finding similarly situated noncitizen entitled to a bond hearing under § 1226(a)). Here, Petitioner has not received a bond hearing and Respondents raise no objection challenging their obligation to provide bond hearings for noncitizens under § 1226(a). Therefore, the Court should find that Petitioner is entitled to a bond hearing and Respondents' failure to provide one violates § 1226(a) of the INA. *Escarcega v. Olson*, No. CIV-25-1129-J, 2025 U.S. Dist. LEXIS 228528, at *6-7 (W.D. Okla. Nov. 20, 2025) (Internal citation omitted and altered).

49. Therefore, the Petitioner is entitled to immediate release or, at the very least, a custody redetermination decided on its merits for a bond hearing. The Petitioner respectfully requests this Court GRANT Petitioner's *Petition* insofar as it finds Respondents violated the INA and ORDERS Respondents to provide Petitioner with a prompt bond hearing under 8 U.S.C. § 1226(a) or otherwise release Petitioner.

COUNT III. This Court should award attorney fees and costs to the Petitioner

50. The Petitioner respectfully requests that he be awarded reasonable costs and attorney's fees. The Tenth Circuit has recently made clear that the Equal Access to Justice Act ("EAJA") "unambiguously authorize[s] fees in habeas actions challenging immigration detention." *Daley v. Ceja*, 158 F.4th 1152 (10th Cir. 2025). EAJA provides that: a court shall award to a prevailing party other than the United States fees and other expenses, in addition to any costs awarded pursuant to subsection (a), incurred by that party in any civil action (other than cases sounding in tort), including proceedings for judicial review of agency action, brought by or against the United States in any court having jurisdiction of that action, unless the court finds that the position of the United States was substantially justified or that special circumstances make an award unjust. 28 U.S.C. § 2412(d)(1)(A).

The Petitioner respectfully requests that this Court allow the Petitioner to file a motion for EAJA fees, including attorney fees and other costs.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment;
- (3) Declare Respondents violated the INA and ORDERS Respondents to provide Petitioner with a prompt bond hearing under 8 U.S.C. § 1226(a) or otherwise release Petitioner
- (4) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- (5) Grant any further relief this Court deems just and proper.

Respectfully Submitted,

Dated: February 9, 2026, Oklahoma City, Oklahoma

/s/ Brian R. Glass

Brian R. Glass, Esq.

Law Office of Glass, Wood, Wang & Associates

10400 Vineyard Blvd, Suite G100

Oklahoma City, OK 73120

Tel: (405) 849-5145

Email: brian@glasswoodwang.com

Attorney for Petitioner

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Tianqiang Huang, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: February 9, 2026
Oklahoma City, Oklahoma

/s/ Brian R. Glass
Brian R. Glass, Esq.
Law Office of Glass, Wood, Wang & Associates
10400 Vineyard Blvd, Suite G100
Oklahoma City, OK 73120
Tel: (405) 849-5145
Email: brian@glasswoodwang.com
Attorney for Petitioner