



U.S. Department of Justice

United States Attorney

Eastern District of Pennsylvania

Isaac J. Jean-Pierre

Assistant United States Attorney

Direct Dial: (215) 861-8372

Facsimile: (215) 861-8618

E-mail Address: Isaac.Jean-Pierre@usdoj.gov

615 Chestnut Street

Suite 1250

Philadelphia, Pennsylvania 19106-4476

(215) 861-8200

February 11, 2026

VIA ECF FILING

Honorable Karen Spencer Martson
Judge, United States District Court
5118 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1744

**Re: Ilia Galdava v. John Rife, Field Office Director of
Enforcement and Removal Operations, *et al.*
Civil Action No. 2:26-cv-01474-KSM**

Dear Judge Marston:

Please accept this letter brief in response to the Court's February 9, 2026 email that Respondents advise the Court "if this case is factually and legally the same as the other recent cases" decided by this Court. At the time the habeas petition was filed, petitioner Ilia Galdava was detained at FDC Philadelphia before being transferred to the Pike County Correctional Facility, where he currently remains. Petitioner seeks release from immigration detention.

Though Respondents oppose the Petition, they concede that this matter is legally and factually similar to recent cases decided by this Court. Respondents nevertheless respectfully remain of the view that their legal positions are correct and therefore—despite the great weight of contrary decisions by this Court and in this District—incorporate the arguments made in those cases into this letter brief.

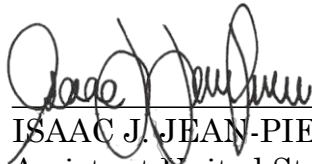
Additionally, Respondents note — acknowledging that this Court has

already considered and disagreed with — the U.S. Court of Appeals for the Fifth Circuit’s precedential decision in *Buenrostro-Mendez v. Bondi*, ___F.4th___, No. 25-20496, 2026 WL 323330 (5th Cir. Feb. 6, 2026), which reversed two district courts and held that 8 U.S.C. § 1225(b)(2)(A) requires the mandatory detention of noncitizens “seeking admission” to the United States, with no right to bond hearings. Respondents further argue that Petitioner is lawfully detained pursuant to 8 U.S.C. § 1225(b)(2) and the BIA’s precedential decision in *Q. Li*.

The United States respectfully asks the Court to deny the Petition.

Respectfully submitted,

DAVID METCALF
United States Attorney

A handwritten signature in black ink, appearing to read 'Isaac J. Jean-Pierre', is written over a horizontal line.

ISAAC J. JEAN-PIERRE
Assistant United States Attorney

cc: Conor A. Deane, Esq.