

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

SAIDOV,

Petitioner,

v.

JAMISON, et al,

Respondents.

PETITIONER'S REPLY

Case No. 26-1669

DISTRICT JUDGE HODGE

PETITIONER'S REPLY TO RESPONSE

Respondents offer no individualized reason for revoking Petitioner's parole on any criminal or national security grounds, failing to extend parole, or disrupting the status quo of release for the Petitioner after termination of parole. Petitioner had been in non-detained removal proceedings and was expected to complete his individual hearing in the Philadelphia Immigration Court this spring. Immediate release (restoring him to the conditions of release and liberty interests he obtained in the United States after entry) would allow him time to coordinate with counsel in finalizing document collection and complete his upcoming May 29, 2026 hearing, and complete the shopping errand that was interrupted by an arbitrary stop and detention by ICE.

Judges in this district are on well-trodden ground. This case in particular can be resolved with immediate release under the same reasoning provided in *Gagiev v. Rose*, No. 2:26-cv-00169-JFM, 2026 WL 657739 (E.D. Pa. Mar. 9, 2026), for another Arriving Alien who was not seeking admission and whose parole ended without extension and without resolving the underlying reason fo  The detention without a pre-deprivation bond hearing was unlawful, and the court in Mr. Gagiev's case ordered immediate release. *See Gagiev*, No. 2:26-

cv-00169-JFM, at *12–13. So in this case, Petitioner respectfully requests, through undersigned counsel, immediate release.

Date: March 19, 2026

Respectfully Submitted,

/s Adam R. Boyd

Adam R. Boyd
(FL 1018489 / DC 1718941 / PA 338285)

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Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 19, 2026, he served a copy of the attached:

PETITIONER'S REPLY

by electronic service to Respondents' Counsel via ECF.

Date: March 19, 2026

Respectfully submitted,

/s Adam R. Boyd

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