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12 **UNITED STATES DISTRICT COURT**
13 **FOR THE EASTERN DISTRICT OF NEW YORK**

14 George Emad Wadie Habib,
15 *Petitioner,*

16 v.

17 RAUL MALDONADO JR, *in his official*
18 *capacity as Warden, Metropolitan Detention*
19 *Center Brooklyn;*

20 Todd Lyons, *in his official capacity as Acting*
21 *Director, Immigration and Customs*
22 *Enforcement;*

23 JUDITH ALMODOVAR, *in her official*
24 *capacity as Acting Field Office Director, ICE*
25 *Enforcement and Removal Operations New*
26 *York City Field Office*

27 Markwayne Mullin, *in his official capacity as*
28 *Secretary of the U.S. Department of Homeland*
Security; and

Todd Blanche, *in his official capacity as*
Acting Attorney General of the United States.

Respondents.

Case No.:

PETITION FOR WRIT OF HABEAS
IMMIGRATION HABEAS CASE

PRELIMINARY STATEMENT

Petitioner George Emad Wadie Habib, by and through undersigned counsel, respectfully petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241, challenging the legality of his continued civil immigration detention by the United States Department of Homeland Security (“DHS”) and its component agency, United States Immigration and Customs Enforcement (“ICE”). Petitioner is currently detained at the Metropolitan Detention Center in Brooklyn, New York, within the territorial jurisdiction of this Court. Although Petitioner is subject to discretionary detention under 8 U.S.C. § 1226(a), Respondents continue to detain him pursuant to a constitutionally defective custody determination that failed to apply the correct legal standards and resulted in an arbitrary finding of dangerousness.

Petitioner is a lawfully admitted noncitizen who is currently in removal proceedings based solely on an overstay charge. He has substantial ties to the community, is employed by the New York City Department of Environmental Protection, and has no serious criminal history.

Notwithstanding these compelling equities, an Immigration Judge denied bond based on a conclusory determination that Petitioner failed to demonstrate that he does not pose a danger to the community, relying on a minor traffic-related offense. That determination was not supported by the record and did not reflect a meaningful individualized assessment of Petitioner’s circumstances.

Civil immigration detention is non-punitive in nature and must bear a reasonable relationship to its legitimate purposes. Here, Respondents have deprived Petitioner of his liberty without a legally sufficient justification and continue to detain him based on an erroneous and unsupported finding. As a result, Petitioner’s continued confinement is arbitrary and violates the Due Process Clause of the Fifth Amendment. This Petition seeks this Court’s intervention to remedy Petitioner’s unlawful detention and to order his immediate release, or, in the alternative, to

1 require Respondents to provide Petitioner with a prompt, constitutionally adequate bond hearing
2 before a neutral adjudicator applying the correct legal standards and supported by the record.
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4 **I. JURISDICTION AND VENUE**
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- 6 1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §
7 2241, which authorizes federal courts to grant writs of habeas corpus to persons
8 held in custody under or by authority of the United States in violation of the
9 Constitution, laws, or treaties of the United States. Petitioner challenges the legality
10 of his ongoing civil immigration detention by the United States Department of
11 Homeland Security (“DHS”) and its component agency, United States Immigration
12 and Customs Enforcement (“ICE”), and therefore properly invokes this Court’s
13 habeas jurisdiction.
- 14 2. This Court also has jurisdiction pursuant to 28 U.S.C. § 1331 because this action
15 arises under the Constitution and laws of the United States, including the Due
16 Process Clause of the Fifth Amendment. Petitioner seeks relief from unlawful
17 executive detention imposed without constitutionally sufficient procedural
18 protections.
- 19 3. Venue is proper in this District pursuant to 28 U.S.C. § 2241(a) and the immediate
20 custodian rule articulated in *Rumsfeld v. Padilla* because Petitioner is currently
21 confined within the territorial jurisdiction of this Court. Petitioner is detained at the
22 Metropolitan Detention Center in Brooklyn, New York, which lies within the
23 Eastern District of New York. The Warden of the Metropolitan Detention Center
24 Brooklyn is Petitioner’s immediate custodian and is located within this District.
- 25 4. Venue is likewise proper in this District because Petitioner is detained here,
26 Respondents exercise custody over him here, and the constitutional injuries arising
27 from his unlawful detention are occurring within this District.
- 28 5. Venue is further proper in this District because Respondents, including the Field
Office Director of U.S. Immigration and Customs Enforcement, Enforcement and

1 Removal Operations, New York City Field Office, exercise legal custody and
2 control over Petitioner's immigration detention within this District and are
3 responsible for the decisions and policies governing his continued confinement.
4 Accordingly, this Court has jurisdiction over all Respondents who have the
5 authority to effectuate Petitioner's release.

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7 **II. PARTIES**

- 8
9 6. Petitioner George Emad Wadie Habib is a native and citizen of Egypt who is
10 currently detained pursuant to the immigration laws of the United States.
11 Petitioner is presently confined at the Metropolitan Detention Center in
12 Brooklyn, New York, located within the Eastern District of New York.
13 Petitioner is in the custody of Respondents and is being held in civil
14 immigration detention in connection with ongoing removal proceedings.
15 7. Respondent Warden of the Metropolitan Detention Center Brooklyn, is the
16 immediate custodian of Petitioner and is responsible for his physical detention.
17 The Warden exercises day-to-day control over Petitioner's confinement and is
18 therefore a proper respondent in this habeas action pursuant to *Rumsfeld v.*
19 *Padilla*.
20 8. Respondent, Field Office Director, U.S. Immigration and Customs
21 Enforcement, Enforcement and Removal Operations of the New York City
22 Field Office, is responsible for the legal custody and supervision of Petitioner's
23 immigration detention and has authority over decisions regarding his continued
24 detention and release. This Respondent is sued in his or her official capacity.
25 9. Respondent Todd Lyons, Director of U.S. Immigration and Customs
26 Enforcement, is responsible for the administration and enforcement of the
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1 nation's immigration detention system and exercises supervisory authority over
2 Petitioner's detention. He is sued in his official capacity.

3 **10.** Respondent Markwayne Mullin, Secretary of the Department of Homeland
4 Security, is charged with the administration and enforcement of the immigration
5 laws of the United States, including the detention of noncitizens. He is sued in
6 his official capacity.

7 **11.** Respondent Todd Blanche, Acting Attorney General of the United States, is the
8 head of the United States Department of Justice and is responsible for the
9 administration of the nation's immigration courts through the Executive Office
10 for Immigration Review. He is sued in his official capacity.

11 **III. FACTUAL AND PROCEDURAL BACKGROUND**

12 **12.** Petitioner George Emad Wadie Habib is a native and citizen of Egypt.

13 **13.** Petitioner was lawfully admitted to the United States on or about December 11,
14 2023, at or near John F. Kennedy International Airport in New York, New
15 York, as a nonimmigrant visitor for pleasure (B-2), with authorization to remain
16 in the United States for a temporary period not to exceed June 10, 2024.

17 **14.** Petitioner remained in the United States beyond the expiration of his authorized
18 stay. As a result, the Department of Homeland Security ("DHS") initiated
19 removal proceedings against him under section 237(a)(1)(B) of the Immigration
20 and Nationality Act as a nonimmigrant overstay.

21 **15.** On or about March 19, 2026, officers with U.S. Immigration and Customs
22 Enforcement ("ICE") arrested Petitioner in New York pursuant to a warrant of
23 arrest and placed him into civil immigration detention. Petitioner was taken into
24 custody without incident and processed for removal proceedings.

25 **16.** Following his arrest, DHS served Petitioner with a Notice to Appear initiating
26 removal proceedings before the Immigration Court. Petitioner's case is
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1 currently pending before the Immigration Court in New York, and a master
2 calendar hearing has been scheduled at the Varick Street Immigration Court.

3 17. Petitioner is currently detained at the Metropolitan Detention Center in
4 Brooklyn, New York, where he remains in the physical custody of the Warden
5 and under the legal authority of ICE.

6 18. Petitioner's detention arises under 8 U.S.C. § 1226(a), which governs
7 discretionary detention of noncitizens pending removal proceedings and entitles
8 Petitioner to an individualized custody determination.

9 19. Prior to his detention, Petitioner resided in Staten Island, New York, and was
10 employed by the New York City Department of Environmental Protection as an
11 engineer. Petitioner has established substantial ties to the New York
12 community, including stable residence, lawful employment, and ongoing
13 professional development.

14 20. Petitioner is highly educated and has completed formal engineering studies. He
15 is actively pursuing licensure as a professional engineer and has demonstrated a
16 sustained commitment to his professional career in the United States.

17 21. Petitioner has no history of violent criminal conduct. Although Petitioner was
18 previously arrested for a driving-related offense, that matter resulted in a non-
19 violent traffic-related conviction and does not constitute a serious or violent
20 crime.

21 22. Petitioner requested a custody redetermination hearing before an Immigration
22 Judge pursuant to 8 C.F.R. § 1236.

23 23. On April 2, 2026, following a bond hearing before the Immigration Court in
24 Elizabeth, New Jersey, the Immigration Judge denied Petitioner's request for
25 release, concluding that Petitioner had not met his burden of establishing that he
26 does not pose a danger to property or the community.

27 24. The Immigration Judge's determination was summary in nature and did not
28 meaningfully address the substantial evidence submitted by Petitioner

1 demonstrating that he is neither a danger to the community nor a flight risk,
2 including his employment, education, and strong community ties.

3 25. Petitioner's removal proceedings remain pending, and no final order of removal
4 has been entered.

5 26. As a result of the Immigration Judge's determination, Petitioner remains
6 detained without a constitutionally adequate individualized assessment of
7 whether his continued confinement is justified.

8 27. Petitioner's continued detention is therefore arbitrary, unsupported by the
9 record, and in violation of the Due Process Clause of the Fifth Amendment.
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11 **IV. STATUTORY AND CONSTITUTIONAL FRAMEWORK GOVERNING**
12 **DETENTION**
13

14 28. The authority of the federal government to detain noncitizens arises solely from,
15 and is limited by, the Immigration and Nationality Act ("INA"), which
16 establishes distinct statutory schemes governing immigration detention.

17 29. Under the INA, noncitizens who have been admitted into the United States and
18 are placed in removal proceedings are generally detained pursuant to 8 U.S.C. §
19 1226. Section 1226(a) authorizes the discretionary detention of such individuals
20 pending a decision on removal and permits release on bond or conditional
21 parole. See *Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018).

22 30. Section 1226(a) requires an individualized determination of whether continued
23 detention is necessary to serve the government's legitimate interests, including
24 ensuring the noncitizen's appearance at future proceedings and protecting the
25 community from danger. In making this determination, an Immigration Judge
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1 must consider the totality of the circumstances and evaluate all relevant
2 evidence.

3 31. Immigration detention under § 1226(a) is civil in nature and not punitive. As
4 such, it is subject to the constraints of the Due Process Clause of the Fifth
5 Amendment, which prohibits arbitrary deprivations of liberty. See *Zadvydas v.*
6 *Davis*, 533 U.S. 678, 690 (2001).

7 32. The Supreme Court has recognized that “[f]reedom from imprisonment—from
8 government custody, detention, or other forms of physical restraint—lies at the
9 heart of the liberty that [the Due Process] Clause protects.” *Id.* at 690.

10 33. Accordingly, civil detention must bear a reasonable relationship to its legitimate
11 regulatory purposes and may not be imposed in a manner that is excessive,
12 arbitrary, or unsupported by adequate procedural safeguards.

13 34. To satisfy due process, a noncitizen detained under § 1226(a) must be afforded
14 a meaningful opportunity to be heard before a neutral decision-maker, and the
15 resulting custody determination must be based on an individualized assessment
16 supported by the record.

17 35. Courts have recognized that a bond hearing that fails to properly consider
18 relevant evidence, applies incorrect legal standards, or results in a conclusory
19 determination does not satisfy the requirements of due process and cannot
20 justify continued detention.

21 36. Where continued detention is based on a legally deficient custody
22 determination, such detention exceeds the statutory authority conferred by §
23 1226(a) and violates the Fifth Amendment.

24 37. Federal courts retain authority under 28 U.S.C. § 2241 to review the legality of
25 immigration detention and to order appropriate relief where detention is found
26 to be unlawful or unconstitutional.

27 **V. COUNT I: VIOLATION OF THE FIFTH AMENDMENT DUE PROCESS**
28 **CLAUSE (DEFECTIVE BOND HEARING)**

- 1 38. Petitioner incorporates by reference the foregoing paragraphs as though fully set
2 forth herein.
- 3 39. The Fifth Amendment to the United States Constitution prohibits the federal
4 government from depriving any person of liberty without due process of law.
5 Noncitizens in removal proceedings are entitled to due process protections,
6 including a meaningful opportunity to challenge their detention. See *Zadvydas*
7 *v. Davis*, 533 U.S. 678, 690 (2001).
- 8 40. Civil immigration detention under 8 U.S.C. § 1226(a) must be reasonably
9 related to its legitimate regulatory purposes and may not be arbitrary or
10 excessive. See *Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018). Accordingly,
11 detention pursuant to § 1226(a) requires a constitutionally adequate,
12 individualized determination of whether continued confinement is justified.
- 13 41. The Second Circuit has made clear that due process requires that immigration
14 detention be accompanied by adequate procedural safeguards to ensure that the
15 deprivation of liberty is justified. See *Velasco Lopez v. Decker*, 978 F.3d 842,
16 849–50 (2d Cir. 2020) (holding that prolonged detention without adequate
17 procedural protections violates due process).
- 18 42. A bond hearing under § 1226(a) must provide a meaningful opportunity to be
19 heard before a neutral adjudicator and must result in an individualized
20 determination based on the record. A decision that fails to consider relevant
21 evidence or rests on conclusory reasoning does not satisfy due process. See
22 *Singh v. Holder*, 638 F.3d 1196, 1203–04 (9th Cir. 2011) (recognizing that due
23 process requires a meaningful hearing with adequate procedural safeguards).
- 24 43. In this case, Petitioner was afforded a custody redetermination hearing;
25 however, that hearing was constitutionally deficient and did not provide the
26 meaningful process required by the Fifth Amendment.
- 27 44. On April 2, 2026, the Immigration Judge denied Petitioner’s request for release,
28 concluding in a summary determination that Petitioner had failed to meet his

1 burden of establishing that he does not pose a danger to property or the
2 community.

3 45. The Immigration Judge's decision did not meaningfully engage with the
4 substantial evidence presented by Petitioner demonstrating that he is neither a
5 danger to the community nor a flight risk, including his employment with a
6 New York City agency, his educational background as an engineer, his pursuit
7 of professional licensure, and his strong community ties.

8 46. Instead, the Immigration Judge relied on a conclusory and unsupported finding
9 of dangerousness based on a non-violent, traffic-related offense.

10 47. Such a determination does not constitute a meaningful individualized
11 assessment and reflects a failure to apply the correct legal standards governing
12 custody determinations under § 1226(a).

13 48. The use of conclusory reasoning, without adequate consideration of the record,
14 renders the bond determination arbitrary and constitutionally deficient. See
15 *Velasco Lopez*, 978 F.3d at 853 (emphasizing that due process requires
16 procedures sufficient to justify continued detention).

17 49. Because Petitioner's continued detention rests on a legally insufficient and
18 procedurally defective custody determination, his confinement is not reasonably
19 related to any legitimate governmental purpose and is therefore
20 unconstitutional.

21 50. As a result, Petitioner is being deprived of his liberty without due process of law
22 in violation of the Fifth Amendment.

23 51. Petitioner is entitled to habeas relief, including immediate release or, in the
24 alternative, a new custody hearing that comports with the requirements of due
25 process and applies the correct legal standards.

26 **VI. COUNT II: UNLAWFUL DETENTION IN EXCESS OF STATUTORY**
27 **AUTHORITY (8 U.S.C. § 1226(A))**
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1 52. Petitioner incorporates by reference the foregoing sections as though fully set
2 forth herein.

3 53. The authority of the Department of Homeland Security (“DHS”) to detain
4 noncitizens pending removal proceedings arises solely from, and is limited by,
5 the Immigration and Nationality Act (“INA”).

6 54. Petitioner is detained pursuant to 8 U.S.C. § 1226(a), which authorizes the
7 discretionary detention of noncitizens pending a decision on removal and
8 permits release on bond or conditional parole.

9 55. Although § 1226(a) confers discretionary authority, that authority is not
10 unlimited. The Supreme Court has recognized that immigration detention must
11 operate within the bounds of the statutory scheme established by Congress and
12 may not be exercised in an arbitrary manner. See *Jennings v. Rodriguez*, 583
13 U.S. 281, 289 (2018).

14 56. The Second Circuit has likewise recognized that detention under § 1226(a) must
15 be supported by adequate procedural safeguards and a lawful exercise of
16 discretion consistent with the statute’s purposes. See *Velasco Lopez v. Decker*,
17 978 F.3d 842, 850–51 (2d Cir. 2020).

18 57. Section 1226(a) contemplates an individualized determination as to whether
19 continued detention is necessary to serve legitimate governmental interests,
20 including preventing flight and protecting the community.

21 58. Where detention is continued based on a legally deficient custody
22 determination—such as one that fails to consider relevant evidence or rests on
23 unsupported conclusions—such detention exceeds the authority conferred by §
24 1226(a). See *Hechavarria v. Sessions*, 891 F.3d 49, 54–56 (2d Cir. 2018)

(recognizing limits on detention authority under the INA and the importance of the correct statutory framework).

59. In this case, Petitioner's continued detention is predicated on a custody determination that is legally insufficient and inconsistent with the requirements of § 1226(a).

60. The Immigration Judge's finding that Petitioner poses a danger to the community rests on a conclusory determination and an improper reliance on a non-violent, traffic-related offense.

61. The Immigration Judge failed to properly evaluate the totality of the circumstances, including Petitioner's employment with a New York City agency, his professional background as an engineer, his pursuit of licensure, and his substantial ties to the community.

62. As a result, the decision to continue Petitioner's detention does not reflect a lawful exercise of discretion under § 1226(a), but instead constitutes an arbitrary and unsupported deprivation of liberty.

63. Because the custody determination underlying Petitioner's detention is legally deficient, Respondents lack statutory authority to continue detaining him under § 1226(a).

64. Petitioner's continued detention therefore exceeds the authority granted by Congress and is unlawful.

65. Petitioner is entitled to habeas relief, including immediate release or, in the alternative, a new custody determination conducted in accordance with the governing statutory standards.

VII. EXHAUSTION OF ADMINISTRATIVE REMEDIES IS EXCUSED

66. Petitioner incorporates by reference the foregoing paragraphs as though fully set forth herein.

67. Although courts may, in limited circumstances, require exhaustion of administrative remedies in habeas proceedings, exhaustion is not jurisdictional

1 and may be excused where it would be futile, inadequate, or where requiring
2 exhaustion would cause irreparable harm. See *McCarthy v. Madigan*, 503 U.S.
3 140, 146–49 (1992).

4 68. The Second Circuit has recognized that exhaustion in the immigration habeas
5 context is a prudential, rather than jurisdictional, requirement and may be
6 excused where administrative remedies are insufficient to address the
7 constitutional violations at issue. See *Beharry v. Ashcroft*, 329 F.3d 51, 56–57
8 (2d Cir. 2003).

9 69. Exhaustion is properly excused where the petitioner raises substantial
10 constitutional claims that cannot be meaningfully remedied through the
11 administrative process. See *Garcia v. Shanahan*, 615 F. App'x 5, 7 (2d Cir.
12 2015) (recognizing that exhaustion may be excused where it would be futile or
13 inadequate).

14 70. Here, Petitioner challenges the legality of his continued detention on
15 constitutional grounds, including violations of the Due Process Clause arising
16 from a defective custody determination. The administrative process is not
17 equipped to provide adequate relief for these claims.

18 71. Although Petitioner could appeal the Immigration Judge's bond determination
19 to the Board of Immigration Appeals ("BIA"), such an appeal would be futile
20 and inadequate to remedy the constitutional violations alleged herein.

21 72. The BIA lacks authority to provide the full relief requested in this Petition,
22 including immediate release based on constitutional grounds, and is limited to
23 reviewing the Immigration Judge's discretionary custody determination.

24 73. Moreover, requiring exhaustion would result in continued unlawful detention
25 and irreparable harm, as Petitioner remains deprived of his physical liberty
26 during the pendency of any administrative appeal.

27 74. Courts within the Second Circuit routinely excuse exhaustion in immigration
28 detention cases where, as here, the petitioner raises constitutional challenges to

1 the legality of continued detention. See *Velasco Lopez v. Decker*, 978 F.3d 842,
2 845–46 (2d Cir. 2020).

- 3 75. Accordingly, exhaustion of administrative remedies is excused because it would
4 be futile, inadequate, and would result in irreparable harm to Petitioner.

5 **VIII. IRREPARABLE HARM**

- 6 76. Petitioner incorporates by reference the foregoing paragraphs as though fully set
7 forth herein.

- 8 77. Petitioner is suffering ongoing and irreparable harm as a result of his unlawful
9 civil immigration detention. The deprivation of physical liberty, even for a
10 minimal period of time, constitutes irreparable injury. See *Elrod v. Burns*, 427
11 U.S. 347, 373 (1976).

- 12 78. The Second Circuit has likewise recognized that “[i]t is well established that the
13 loss of liberty constitutes irreparable harm.” *Jolly v. Coughlin*, 76 F.3d 468, 482
14 (2d Cir. 1996).

- 15 79. Petitioner remains detained based on a constitutionally defective custody
16 determination and is therefore subjected to an ongoing deprivation of liberty
17 that cannot be adequately remedied by monetary damages or post hoc relief.

- 18 80. In addition to the loss of liberty, Petitioner is suffering continuing harm to his
19 professional and personal life. Prior to his detention, Petitioner was employed
20 by the New York City Department of Environmental Protection as an engineer
21 and was actively pursuing licensure as a professional engineer. His continued
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1 detention disrupts his employment, impedes his professional advancement, and
2 jeopardizes his future career.

3 81. Petitioner also suffers harm to his personal stability and community ties,
4 including the loss of his residence, disruption of daily life, and separation from
5 his community in New York.

6 82. These harms are ongoing and will continue for the duration of Petitioner's
7 detention absent intervention by this Court.

8 83. Courts within this Circuit have recognized that continued detention without
9 adequate procedural protections constitutes irreparable harm warranting judicial
10 intervention. See *Velasco Lopez v. Decker*, 978 F.3d 842, 855 (2d Cir. 2020).

11 84. Because Petitioner is currently subject to an ongoing deprivation of liberty
12 based on an unlawful and constitutionally deficient custody determination, he
13 will continue to suffer irreparable harm unless this Court grants relief.

14 **IX. REQUESTED RELIEF**

15 WHEREFORE, Petitioner respectfully requests that this Court grant the following
16 relief:

- 17 A. Issue a writ of habeas corpus under 28 U.S.C. § 2241 declaring that Petitioner's
18 continued detention violates the Constitution and laws of the United States
19 B. Order Petitioner's immediate release from custody under reasonable conditions of
20 supervision;
21 C. In the alternative, order Respondents to provide Petitioner with a prompt bond
22 hearing before a neutral adjudicator that comports with the requirements of due
23 process, including a meaningful individualized determination based on the record
24 and the application of correct legal standards;
25 D. Order that any such bond hearing be conducted within a specified and expedited
26 timeframe to be set by this Court;
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1 E. Pending this Court's final determination, enjoin Respondents from transferring
2 Petitioner outside the jurisdiction of the Eastern District of New York;

3 F. Grant such other and further relief as this Court deems just and proper.
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5 04/06/2026
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7 /s/ Sherif Bishara

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13 *Attorney for Petitioner*
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VERIFICATION

(28 U.S.C. § 2242)

I Sherif Bishara am the attorney for Petitioner George Emad Wadie Habib, in this habeas corpus proceeding. Petitioner is currently detained in immigration custody and is therefore unable to execute this verification himself.

Pursuant to 28 U.S.C. § 2242, I verify on behalf of Petitioner that the factual statements contained in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge, information, and belief, based on my communications with Petitioner and review of available records.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of April 2026, at Newark New Jersey.

/s/ Sherif Bishara

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th of April 2026, a true and correct copy of the foregoing Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 was filed electronically with the Clerk of the Court using the CM/ECF system for the United States District Court for the Eastern District of New York.

I further certify that service was thereby effectuated upon all counsel of record, including the Office of the United States Attorney for the Eastern District of New York which represents Respondents in this action. In addition, a true and correct copy of the foregoing Petition will be served upon the Respondents and the Office of the United States Attorney in accordance with Rule 4(i) of the Federal Rules of Civil Procedure.

I declare under penalty of perjury that the foregoing is true and correct.

Date: April 6, 2026
/s/ Sherif Bishara

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