

Brooklyn ^(BDS) Defenders

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May 29, 2026

By ECF

Honorable Ann Donnelly
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *D.J.R.R. v. Genalo et al.*, 1:26-cv-03124-AMD

Dear Judge Donnelly:

Brooklyn Defender Services (BDS) represents Petitioner in the above-captioned case, which is a habeas petition that seeks release from immigration custody and procedural protections against third-country removal. On May 28, 2026, upon review of the letter filed by the government at ECF No. 7, undersigned counsel learned for the first time that an additional petition had been filed on Petitioner's behalf on May 22, 2026. Undersigned counsel immediately reached out to the attorney listed in that case, Yuri Hovhannisyan, who informed counsel that Petitioner's wife had contacted his office upon Petitioner's detention and that he filed the petition as an emergency measure, but his office has never spoken to Petitioner. Mr. Hovhannisyan reported that he is not admitted in federal court; as such, the petition was originally filed *pro se* in the Southern District of New York. Petitioner's wife reported to immigration counsel that although she had reached out to Mr. Hovhannisyan's office upon her spouse's detention (prior to being able to reach immigration counsel at BDS), they required a deposit which she informed them she could not pay, and she did not realize that anything had been filed by that office. Although undersigned counsel has not at the time of this filing been provided a copy of the petition filed by Mr. Hovhannisyan, Mr. Hovhannisyan has indicated to counsel he will withdraw the petition.

BDS has represented Petitioner since May 2024 in his immigration proceedings, including representing Petitioner in September 2024 when he was granted withholding of removal. An attorney from our office met with Petitioner at Metropolitan Detention Center on May 22, 2026 prior to filing the petition in the above-captioned case.

I thus respectfully request that the Court reinstate the previously issued briefing schedule in the above-captioned case, albeit with an extension of one day for both the government's response and Petitioner's reply to account for the delay caused by clarification of the dual filings.

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The second case, at docket no 1:26-cv-03152, should continue to have its briefing schedule suspended.¹

I thank the Court for its consideration of this letter.

Respectfully submitted,

/s/ Alexandra Lampert

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cc: Counsel of Record (by ECF)

¹ Undersigned counsel will continue to reach out to Mr. Hovhannisyan regarding disposal of the second case or is prepared to follow any other directive of the Court as to that petition.