U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 7, 2025

By ECF
The Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Zhi Ming Zhang v. Kenneth Genalo, et al.*, No. 25 Cv. 8772 (JPO)

Dear Judge Oetken:

This Office represents the Government in the above-captioned habeas corpus action. The Government's deadline to file its opposition to the petition was November 6, 2025 (Dkt. 13). While the Government timely filed its Return (Dkt. 14) and Declaration (Dkt. 15), its Memorandum of Law in Opposition to Petitioner's Petition for Habeas Corpus (Dkt. 16) was not filed until 12:08 a.m. on November 7, 2025, *i.e.*, eight minutes late. The filing was delayed because an automated system update that overrides our network interrupted certain applications, which affected my ability to file and to compile the table of authorities in the brief. Accordingly, the Government respectfully requests leave, *nunc pro tunc*, to re-file its brief today, without substantive changes, for the purpose of including a complete and corrected table of authorities.

I contacted Petitioner's counsel to seek his consent to this request, but, as of the filing of this letter, I have not heard back from him. I apologize to the Court and the Petitioner for the short delay in the filing of the Government's brief, and I thank the Court for its consideration of this request.

Respectfully,

JAY CLAYTON
United States Attorney

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