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Hon. Nusrat J. Choudhury
100 Federal Plaza,
Central Islip, NY 11722

Dear Judge:

In re: Valdes vs. Nassau Correctional et. al. 26-CV-260

Good morning, I represent the petitioner in the afore-noted Petition for Habeas Corpus.

This is an anticipatory response to any assertion by respondents that this matter should be transferred out of this district because the Petitioner was moved to Pennsylvania earlier this morning.

Firstly, Petitioner was transferred *after* the petition was filed.

As such, EDNY is the correct district for this matter. Please the decision in *Ozturk v. Hyde, 136 F.4th 382, 390 (2d Cir. 2025)* whose facts are quite similar to the instant matter.

Furthermore, aside from the issue of custody, the petition alleges due process violations that occurred within EDNY.

Finally, an integral part of Petitioner's claims in this Habeas petition involves Petitioner's prior conviction in the EDNY (*USA vs Luz Valdez, CR-02-479*) as well as the actions of DOJ in EDNY.

Yours truly

LORNE KELMAN