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February 21, 2026

By ECF

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Shohag v. Maldonado*, et al. Civil Action No. 26-cv-0856 (Chen, J.)

Dear Honorable Judge Chen:

This Office represents Petitioner in this matter and writes in response to Respondents' Letter, ECF No. 5 ("Letter").

Petitioner maintains that this case is indistinguishable from prior decisions issued by this Court[1], both with respect to the merits (the Petitioner is detained under 8 U.S.C. § 1226(a)), and to the appropriate remedy (immediate release). Respondents' Letter offers no persuasive argument to the contrary.

Respectfully submitted,

/s/ Michael Goldman
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Attorney for the Petitioner

[1] *See, e.g., Galeas Miranda v. Maldonado*, 25-CV-6882 (PKC), 2026 WL 25405 (E.D.N.Y. Jan. 5, 2026).