

IN THE
Supreme Court of the United States

KENNETH GENALO, DIRECTOR OF THE NEW YORK FIELD
OFFICE OF U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, ET AL.,

Petitioners,

v.

KEISY G.M.,

Respondent.

**On Writ of Certiorari to the
United States Court of Appeals
for the Second Circuit**

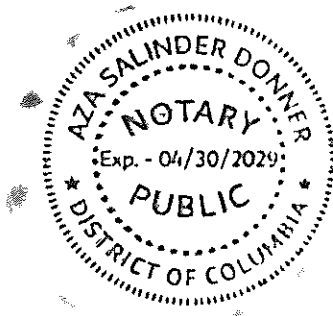
**BRIEF OF *AMICI CURIAE* SCHOLARS OF
EARLY IMMIGRATION DETENTION
IN SUPPORT OF RESPONDENT**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains **7,806** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sworn to and subscribed before me this 8th day of September 2026.





AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.