

April 27, 2026

PUBLIC DOCUMENT

Case No.: A-533-840
Total No. of Pages: 15
21st Administrative Review
(02/01/2025–01/31/2026)
AD/CVD Office IX

This submission does not contain
BUSINESS PROPRIETARY INFORMATION.

BY ELECTRONIC FILING

The Honorable Howard Lutnick
Secretary of Commerce
Attn: Enforcement and Compliance
APO/Dockets Unit, Room 18022
U.S. Department of Commerce
14th Street and Constitution Avenue, NW
Washington, DC 20230

Re: Administrative Review of the Antidumping Duty Order on Frozen Warmwater Shrimp from India: Comments on the proposed rescission of Aadhya Sea Foods Private Limited's Review

Dear Secretary Lutnick,

Aadhya Sea Foods Private Limited (“Aadhya”) is a processor and exporter of frozen shrimp from India. Aadhya submits the comments below in relation to the Department’s notice of partial rescission published on April 20, 2026 (“Notice”).¹ These comments are filed within the due date set in the Notice and are thus timely.

The Department proposes to rescind the 21st administrative review (February 1, 2025 ~ January 31, 2026) (“AR21”) for several companies including Aadhya “{i}n the absence of any

¹ Notice of Intent to Rescind Review, In Part dated April 20, 2026.

suspended entries during the POR from certain companies subject to the review”. However, contrary to the Department’s finding, Aadhya has one entry in AR21. As explained below, the entry documents for the relevant shipment show that the subject merchandise was entered and released by U.S. Customs and Border Protection (“CBP”), on January 30, 2026, that is, within the POR. Accordingly, the Department should not rescind the review with respect to Aadhya.

The record documents for this shipment consistently show that the relevant entry occurred within the POR. First, the CBP Entry Summary (Form 7501) for the shipment shows Entry Date: 01/30/26 in Block 7 and Import Date: 01/30/26 in Block 11. The same form shows Summary Date: 02/11/26, which is the date on which the entry summary was filed. Thus, the entry summary itself reflects that the relevant entry date was January 30, 2026. A copy of the Entry Summary form is provided as Exhibit 1.

Second, the CBP Entry/Immediate Delivery document (Form 3461) and accompanying cargo release results further confirm that the shipment was timely entered and released within the POR. The Form 3461 package reflects the same entry number, 8P5-0090153-0, and contains an Electronic Entry Release Notification stating that proper release for the cargo was received from U.S. Customs on 01/30/26. In addition, the cargo release results show the status “98: RELEASED, Release Date Update: 01/30/26,” with the release activity reflected at 1:21 PM EST on January 30, 2026. A copy of the CBP Entry/Immediate Delivery document (Form 3461) is attached as Exhibit 2.

Third, the shipment documents are consistent with these CBP records. The air waybill bears AWB number 020-04516750 and identifies the destination as Newark, matching the shipment covered by the entry documents. A copy of the Airway Bill is attached as Exhibit 3.

A copy of the commercial invoice corresponding to the same transaction and merchandise is attached as Exhibit 4.

For these reasons, the factual basis for rescission does not exist. The documents submitted by Aadhya demonstrate that it had a reviewable entry during the POR, and therefore Aadhya should remain in this administrative review.

In the alternative, if the Department does not find the foregoing sufficient and instead intends to rely on CBP data indicating a different entry date, then Aadhya respectfully requests that the Department to provide the relevant CBP entry data relating to Aadhya to the company, or otherwise disclose the substance of the data on which it intends to rely to the extent permitted, and provide Aadhya an opportunity to comment and respond before making any final determination to rescind. Given the inconsistency between the CBP website extract and the primary entry documents submitted here, such an opportunity would help ensure that the Department's decision is based on a complete and accurate understanding of the entry documentation and the relevant CBP records.

For the foregoing reasons, Aadhya respectfully requests that the Department not rescind the review with respect to Aadhya. In the alternative, if the Department is not inclined to accept Aadhya's showing at this stage, then Aadhya respectfully requests that the Department place the relevant CBP data on the record and provide Aadhya an opportunity to respond before making any final determination to rescind.

If any further information is required, please contact the undersigned.

Respectfully submitted,
For S Kunapuli & Co



Sivakumar Kunapuli
Consultant to Aadhya Sea Foods Private Limited

AADHYA SEA FOODS PRIVATE LIMITED

H.NO:82-21-12, FLAT NO. G1, SRISATY PRIME, WALKERS ROAD, VENKATESWARA NAGAR, RAJAHMUNDRY
EAST GODAVARI DISTRICT-533106, ANDHRA PRADESH, INDIA

MOBILE NO: +91 99493 38866


E-mail: aadhyafoods@gmail.com

COMPANY CERTIFICATION

I, Koduri Ravindranadh Chowdari , currently employed by Aadhya Sea Foods Private Limited as Director, hereby certify that I prepared or otherwise supervised the preparation of the attached submission of comments on the Department's proposed rescission of our company's review pursuant to the February 1, 2025 ~ January 31, 2026 administrative review of the antidumping duty order on Certain Frozen Warmwater Shrimp from India (A-533-840).

I certify that the public information and any business proprietary information contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make materially false statements to the U.S. Government.

In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: 

Date: April 27, 2026

PROCESSING PLANT: SURVEY NO:30/3, ANNAVARAPPADU PANCHAYAT, MALLESWARAM VILLAGE,
PERAVALI MANDAL, EAST GODAVARI DISTRICT -534330, ANDHRA PRADESH, INDIA

CONSULTANT CERTIFICATION

I, Sivakumar Kunapuli, currently employed by S Kunapuli & Co hereby certify that I prepared or otherwise supervised the preparation of the attached submission of Aadhya Sea Foods Private Limited's comments on proposed rescission notice in the February 1, 2025 ~ January 31, 2026 administrative review of the antidumping duty order on Certain Frozen Warmwater Shrimp from India (A-533-840).

In my capacity as an adviser, counsel, preparer or reviewer of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government.

In addition, I am aware that, even if this submission may be withdrawn from the record of the AD/CVD proceeding, Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that I am filing a copy of this signed certification with this submission to the U.S. Department of Commerce and that I will retain the original for a five-year period commencing with the filing of this document. The original will be available for inspection by U.S. Department of Commerce officials.

Signature:



Date: April 27, 2026

PUBLIC SERVICE LIST

A-533-840

CERTIFICATE OF SERVICE

I, Sivakumar Kunapuli, currently employed by S Kunapuli & Co and Consultant to Aadhya Sea Foods Private Limited, hereby certify that a copy of the foregoing submission has been served this day, by electronic mail or first-class mail or other approved electronic means upon the following persons:

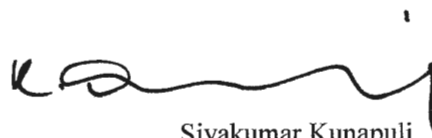
PUBLIC DOCUMENT:

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Sivakumar Kunapuli
S Kunapuli & Co

Date: April 27, 2026

Exhibit-1



ENTRY SUMMARY

1. Filer Code/Entry Number 8P5-0090153-0	2. Entry Type 03 ABI/A	3. Summary Date 02/11/26 BBF	4. Surety Number 846	5. Bond Type 8	6. Port Code 4601	7. Entry Date 01/30/26	
8. Importing Carrier LH		9. Mode of Transport 40		10. Country of Origin IN		11. Import Date 01/30/26	
12. B/L or AWB Number 02004516750		13. Manufacturer ID INAADSEA303AND		14. Exporting Country IN		15. Export Date 01/30/26	
16. I.T. Number	17. I.T. Date	18. Missing Docs	19. Foreign Port of Lading		20. U.S. Port of Unlading 4601		
21. Location of Goods/G.O. Number		22. Consignee Number 93-299977800		23. Importer Number 232704-56804		24. Reference Number	
25. Ultimate Consignee Name (Last, First, M.I.) and Address GREEN ASIA CORP Street: 347 N 2ND ST Destination: NY City: E NEWARK				26. Importer of Record Name (Last, First, M.I.) and Address DWARAKA SEA FOODS Street: SY NO 265, 267, BATLAMACHAVARAM SIVARU, MADDULURU VILLAGE Customer Reference # 02004516750 State: NJ Zip: 07029-2739			
City: E NEWARK				City: SANTHANUTHALAPADU State:		Zip: 523225 IN	
27. Line No.	28. Description of Merchandise			32. A. Entered Value B. CHGS C. Relationship	33. A. HTSUS Rate B. AD/CVD Rate C. IRC Rate D. Visa Number	34. Duty and IR Tax	
	29. A. HTSUS No. B. AD/CVD No.	30. A. Gross Weight B. Manifest Qty.	31. Net Quantity in HTSUS Units			Dollars	Cents
001	RECIP IN 25% DUTY 9903.02.26 RU-IN EO 25% DUTY 9903.01.84 SHRIMPS/PRAWNS,OTH,FRZN,PEELED 0306.17.0041 109 KG 98.10 KG A533-840-000 C533-921-000 499 - Merchandise Processing Fee			\$111 C \$200 N	25% 25% FREE 10.1700% 5.7700% 0.3464%	\$27.75 \$27.75 \$0.00 \$11.29 \$6.40 \$0.38	
Totals for Invoice 02004516750		Invoice Value 185.00 USD		+/- MMV -74.00 USD	Exchange 1.00000	Entered Value 111.00 USD	
Other Fee Summary (for Block 39)		35. Total Entered Value		CBP USE ONLY		TOTALS	
499 - MPF \$33.58	012 - AD \$11.29	013 - CVD \$6.40	\$ 111	A. LIQ Code	B. Ascertained Duty	37. Duty \$55.50	
Total Other Fees \$ 51.27				REASON CODE	C. Ascertained Tax	38. Tax	
36. Declaration of Importer of Record (Owner or Purchaser) or Authorized Agent					D. Ascertained Other	39. Other \$51.27	
I declare that I am the <input type="checkbox"/> Importer of record and that the actual owner, purchaser, or consignee for CBP purposes is as shown above, OR <input checked="" type="checkbox"/> owner or purchaser or agent thereof. I further declare that the merchandise <input checked="" type="checkbox"/> was obtained pursuant to a purchase or agreement to purchase and that the prices set forth in the invoices are true, OR <input type="checkbox"/> was not obtained pursuant to a purchase or agreement to purchase and the statements in the invoices as to value or price are true to the best of my knowledge and belief. I also declare that the statements in the documents herein filed fully disclose to the best of my knowledge and belief the true prices, values, quantities, rebates, drawbacks, fees, commissions, and royalties and are true and correct, and that all goods or services provided to the seller of the merchandise either free or at reduced cost are fully disclosed.					E. Ascertained Total	40. Total \$106.77	
I will immediately furnish to the appropriate CBP officer any information showing a different statement of facts.							
41. Declarant Name (Last, First, M.I.) Lawrence Zhu		Title		Signature		Date 01/28/26	
42. Broker/Filer Information Name (Last, First, M.I.) and Phone Number Leesa Customs Brokerage Inc 9040 Telstar Avenue, Suite 112-115 El Monte, CA 91731 626-522-1821				43. Broker/Importer File Number 0090153 / 02004516750			

Filed By: sivakumark@skunapuli.com, Filed Date: 4/27/26 1:25 PM, Submission Status: Approved

Exhibit-2

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

Page: 1
ABI CERTIFIED
FDA Hold
CST# BBF
Released

ENTRY/IMMEDIATE DELIVERY
Leesa Customs Brokerage Inc
9040 Telstar Avenue, Suite 112-115
El Monte, CA 91731
626-522-1821 Fax: 323-206-5391

19 CFR 142.3, 142.16, 142.22, 142.24

Form Approved
OMB No. 1651-0024
Exp. 08-31-2018

1. ARRIVAL DATE 013026		2. ELECTED ENTRY DATE		3. ENTRY TYPE CODE/NAME 03		4. ENTRY NUMBER 8P5-0090153-0	
5. PORT 4601		6. SINGLE TRANS. BOND		7. BROKER/IMPORTER FILE NUMBER 0090153 / 02004516750			
		8. CONSIGNEE NUMBER 93-299977800				9. IMPORTER NUMBER 232704-56804	
10. ULTIMATE CONSIGNEE NAME GREEN ASIA CORP 347 N 2ND ST E NEWARK, NJ 07029-2739				11. IMPORTER OF RECORD NAME DWARAKA SEA FOODS SY NO 265, 267, BATLAMACHAVARAM SIVARU, MADDULURU VILLAGE SANTHANUTHALAPADU, 523225, IN			
12. CARRIER NAME LH		13. VOYAGE/FLIGHT/TRIP 0402		14. LOCATION OF GOODS-CODE(S)/NAME(S)			
15. VESSEL CODE/NAME							
16. U.S. PORT OF UNLADING 4601		17. MANIFEST NUMBER		18. G.O. NUMBER		19. TOTAL VALUE 111	
20. DESCRIPTION OF MERCHANDISE FROZEN SHRIMPS							
21. IT/BL/AWB CODE M	22. IT/BL/AWB NO. 02004516750	23. MANIFEST QUANTITY 3 CTNS		24. H.S. NUMBER 9903.02.26	25. COUNTRY OF ORIGIN IN	26. MANUFACTURER NO. INAADSEA303AND	
				9903.01.84	IN	INAADSEA303AND	
				0306.17.0041	IN	INAADSEA303AND	

27. CERTIFICATION

I hereby make application for entry/immediate delivery. I certify that the above information is accurate, the bond is sufficient, valid, and current, and that all requirements of 19 CFR Part 142 have been met.

SIGNATURE OF APPLICANT

X Lawrence Zhu

PHONE NO.

626-522-1821

DATE

01/28/26

29. BROKER OR OTHER GOVT. AGENCY USE

Req. Exam at:
Transfer By:

Entry Bond [X]
CHL Bond []

Carrier Bond []
CFS Bond []

28. CBP USE ONLY

OTHER AGENCY ACTION REQUIRED, NAMELY:

CBP EXAMINATION REQUIRED

ENTRY REJECTED, BECAUSE:

DELIVERY AUTHORIZED:

SIGNATURE

DATE

Electronic Entry Release Notification.
I certify proper release for this cargo has been received from U.S. Customs. Date: 01/30/26

Leesa Customs Brokerage Inc
9040 Telstar Avenue, Suite 112-115
El Monte, CA 91731
626-522-1821
Susan Zhou
susan@leesachb.com

Cargo Release Results

Entry Summary: 8P5-0090153-0
Importer: DWARAKA SEA FOODS
Trailer No:
Broker Ref. No: 0090153
Cust. Ref. No: 02004516750
Port of Entry: 4601

Regular Bill: 02004516750 00000003
[1/30/26 13:21] 94: BILL DEPARTED
[1/30/26 13:21] 98: RELEASED, Release Date Update: 01/30/26 - Selectivity Processing Date
[1/30/26 13:21] FDA, FOO: [02] HOLD INTACT
[FDA] Invoice 02004516750, Line 1, FDA Line 1: 149455425 pga [02] HOLD INTACT
[25] ADDITIONAL VERIFICATION NEEDED
PNC: 268151397500, the system has updated the PNC
[132] DOCUMENTATION NEEDED
[FDA] Invoice 02004516750, Line 1, FDA Line 2: 149455540 pga [02] HOLD INTACT
[25] ADDITIONAL VERIFICATION NEEDED
PNC: 268151397511, the system has updated the PNC
[132] DOCUMENTATION NEEDED
[FDA] Invoice 02004516750, Line 1, FDA Line 3: 149456021 pga [02] HOLD INTACT
[25] ADDITIONAL VERIFICATION NEEDED
PNC: 268151397533, the system has updated the PNC
[132] DOCUMENTATION NEEDED

Received: Fri, 01/30/26 1:21 PM EST

[1/30/26 12:05] NMF, SIM: [07] MAY PROCEED
[NMF] Invoice 02004516750, Line 1, NMF Line 1: 149457213 pga [07] MAY PROCEED

Received: Fri, 01/30/26 12:05 PM EST

*All Times are Eastern Standard Time

Master Bill	House Bill	1C
02004516750		1C Entered

Exhibit-3

020|HYD|0451 6750

020 - 0451 6750

Shipper's Name and Address AADHYA SEA FOODS PRIVATE LIMITED G1, 82-21-12, SRI SATYA PRIME, WALKERS ROAD, VENKATESWARA NGAR, RAJAHMUNDRY, EAST GODAVARI ANDHRAPRADESH - 533106 EMAIL: AADHYASEAFOODS@GMAIL.COM		Shipper's Account Number		Not Negotiable Air Waybill Issued by LUFTHANSA CARGO								
Consignee's Name and Address GREENASIA CORP 870,GROOVE AVE, EDISON NEW JERSEY -08820 UNITED STATES OF AMERICA. TEL: .+1 (929)631 - 2085		Consignee's Account Number		Copies 1, 2 and 3 of this Air Waybill are originals and have the same validity. It is agreed that the goods described herein are accepted in apparent good order and condition (except as noted) for carriage SUBJECT TO THE CONDITIONS OF CONTRACT ON THE REVERSE HEREOF. ALL GOODS MAY BE CARRIED BY ANY OTHER MEANS INCLUDING ROAD OR ANY OTHER CARRIER UNLESS SPECIFIC CONTRARY INSTRUCTIONS ARE GIVEN HEREON BY THE SHIPPER, AND SHIPPER AGREES THAT THE SHIPMENT MAY BE CARRIED VIA INTERMEDIATE STOPPING PLACES WHICH THE CARRIER DEEMS APPROPRIATE. THE SHIPPER'S ATTENTION IS DRAWN TO THE NOTICE CONCERNING CARRIER'S LIMITATION OF LIABILITY. Shipper may increase such limitation of liability by declaring a higher value for carriage and paying a supplemental charge if required.								
Issuing Carrier's Agent Name and City TRANSYS GLOBAL FORWARDING PVT LTD		Accounting Information FREIGHT PREPAID		Agent's IATA Code 14-3-2885/0012		Account No.						
Airport of Departure (Addr. of First Carrier) and Requested Routing HYDERABAD				Reference Number		Optional Shipping Information						
To	By First Carrier	Routing and Destination	to	by	to	by	Currency	CHGS Code	WT/VAL	Other	Declared Value for Carriage	Declared Value for Customs
FRA		LH	EWB	LH			INR	PP	X	X	NVD	NCV
Airport of Destination NEWARK		Requested Flight/Date		Amount of insurance XXX		INSURANCE - If Carrier offers insurance, and such insurance is requested in accordance with the conditions thereof, indicate amount to be insured in figures in box marked "amount of insurance".						
Handling Information: PLEASE INFORM CONSIGNEE IMMEDIATELY ON ARRIVAL OF CARGO. MARKS& NO: 03 BOXES. PLS MAINTAIN +02 TO +08 °C TEMPERATURE IN TRANSIT & DESTINATION AIRPORT TILL DELIVERY TO THE FINAL CONSIGNEE.												SCI
No. Of Pieces RCP	Gross Weight	kg	Rate Class	Chargeable Weight	Rate	Total	Nature and Quantity of Goods (incl. Dimensions or Volume)					
03	109.00	K	Q	109.00	AS AGREED	AS AGREED	SAID TO COINTAINS FROZEN RAW PEELED AND DEVEINED TAIL OFF VANNAMEI IQF SHRIMPS HS CODE: 03061720 NET WEIGHT: 23.00 KGS INV NO: ASF/01/2025-26 INV DT: 27.01.2026 DRY ICE UN NO: UN1845 CLASS : 9 NET QTY 03 BOXES: X 28 KGS					
03	109.00					AS AGREED						
Prepaid		Weight Charge		Collect		Other Charges						
AS AGREED												
Valuation Charge												
Tax												
Total Other Charges Due Agent												
Total Other Charges Due Carrier												
AS AGREED												
Total Prepaid		Total Collect										
AS AGREED												
Currency Conversion Rates		CC. Charges in Dest. Currency		28-Jan-26		HYDERABAD						
				Executed on (date)		at (place)		Signature of Issuing Carrier or its Agent				
For Carrier's use only at Destination		Charges at Destination		Total Collect Charges		020 - 0451 6750						



ORIGINAL - 3 (FOR SHIPPER)

Exhibit-4

COMMERCIAL INVOICE							
Exporter AADHYA SEA FOODS PRIVATE LIMITED G1,82-21-12, SRI SATYA PRIME, WALKERS ROAD, VENKATESWARA NAGAR, RAJAHMUNDRY, EAST GODAVARI, ANDHRAPRADESH -533106 Email: Aadhyaseafoods@gmail.com			Invoice No. & Date		Exporter's Ref		
			ASF/01/2025-26 DT:27.01.2026		I.E.CODE	AAUCA6961F	
			Buyer's Order No. & Date		FDA REGN NO		
			GA CORP/05/2025-26 DT:21.01.2026		FDA UFI (DUNS) NO		
Consignee GREENASIA CORP 870, Groove Ave, Edison New Jersey -08820 United States of America. +1 (929)631 - 2085			Other Reference PROCESSED AND PACKED BY				
			AADHYA SEA FOODS PRIVATE LIMITED RS NO.30/3, ANNAVARAPPUDU GRAM PANCHAYAT, MALLESWARAM VILLAGE, PERAVALIMANDAL, ANDHRAPRADESH -534330				
			APPROVAL NO.1992				
Importer On Record: DWARAKA SEA FOODS Street: SY NO 265, 267, BATLAMACHAVARAM SIVARU, MADDULURU VILLAGE, City: SANTHANUTHALAPADU, Zip Code: 523225 IN			Country of origin of goods		Country of Final Destination		
			INDIA		U.S.A		
Vessel/Flight No	Port of Loading		Terms of Delivery and Payment :				
BY AIR	Hyderabad International Airport		PAYMENT: TT AFTER PASSAGE OF US FDA DOOR MOVE / DOOR MOVE				
Port of Discharge	Final Destination						
EWR- Newyork	EWR- Newyork						
Marks & Nos No. & kind of Pkgs Description of Goods					QUANTITY	Price	AMOUNT
Container No:					IN LBS	CNF	USD
3 THERMOCOLE BOX						USD/LB	
T. BOX GRADE PACKETS							
FROZEN RAW PEELED AND DEVEINED TAIL-OFF VANNAMEI IQF SHRIMPS PACKING : 8 X 2 LBS & 9 X 2 LBS HS CODE:030617							
1 26/30 8					16.00	3.70	59.20
2 26/30 8					16.00	3.70	59.20
3 26/30 9					18.00	3.70	66.60
					50.00		185.00
Amount Chargeable (In Words) US DOLLARS ONE HUNDRED EIGHTY-FIVE DOLLARS ONLY							
NET WEIGHT :			22.73 Kg		INV INR	185 USD	
GROSS WEIGHT:			92.00 Kg		FRIGHT	120 USD	
					FOB	65 USD	
					RATE	89.5 USD	
					FOB	5817.5 INR	
DECLARATION : We declare that this invoice show the actual price of the goods described and that all particulars are true and correct					For AADHYA SEA FOODS PRIVATE LIMITED. AUTHORIZED BY <i>J. Rajesh</i>		

