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Attorneys for Respondents

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Vladislav Ishmuratov,

Petitioner,

v.

David R. Rivas, et al.,

Respondents.

No. CV-25-01366-PHX-JAT (ESW)

**RESPONSE TO ORDER TO SHOW
CAUSE**

STATUS UPDATE AND RESPONSE TO ORDER TO SHOW CAUSE

On September 8, 2025, the Court issued an order to show cause (“OSC”) indicating that if the Government has still not received travel documents for Petitioner, in order to remove him to Russia, the Court is inclined to find that there is no significant likelihood of removal in the reasonably foreseeable future and that therefore Petitioner is entitled to release under *Zadvydas v. Davis*, 533 U.S. 678 (2001). Doc. 45.

After receiving the OSC, undersigned counsel immediately reached out to Enforcement and Removal Operations (“ERO”) within the U.S. Immigration and Customs Enforcement (“ICE”) and inquired as to the status of the travel document request to Russia for Petitioner. On September 16, 2025, ICE-ERO informed undersigned counsel that Russia denied the request for travel documents. ICE-ERO also informed undersigned counsel that no other requests for travel documents to any other countries have been made.

1 Because the travel document request that was pending at the time the Government's
2 habeas response was filed has now been denied, and because no other travel document
3 requests have been made, it appears likely the Court will find that Petitioner can establish
4 his removal is not significantly likely in the reasonably foreseeable future. Respondents
5 cannot therefore establish good cause as to why the habeas petition should not be granted
6 at this time.

7 Respectfully submitted this 18th day of September, 2025.

8 TIMOTHY COURCHINE
9 United States Attorney
10 District of Arizona

11 *s/Theo Nickerson*
12 THEO NICKERSON
13 Assistant United States Attorney
14 *Attorneys for Defendant*
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CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and mailed a copy by U.S. Mail of the same to the following individual, who is not registered in the CM/ECF System:

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s/ Mary Simeonoff
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