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Counsel for Petitioner

UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

ARTEM VASKANYAN,

Petitioner,

v.

JAMES JANECKA, et al.

Respondents.

Case No. 5:25-CV-01475-CAS-AS

**PETITIONER'S REPLY IN SUPPORT OF GRANT
OF PETITION FOR A WRIT OF HABEAS CORPUS**

Petitioner Artem Vaskanyan ("Petitioner") respectfully submits this reply in support of his Petition for a Writ of Habeas Corpus. *See ECF No. 19*. The parties agree that the Petition is ripe for decision (*ECF No. 25 at 4*), and there is no dispute that there is

1 no likelihood of Petitioner being removed in the reasonably foreseeable future. The
2 Supreme Court has instructed that “if removal is not reasonably foreseeable, the court
3 should hold continued detention unreasonable and no longer authorized by statute.”
4 *Zadvydas v. Davis*, 533 U.S. 678, 699 (2001). Petitioner requests that the Court grant his
5 Petition immediately so that he can be released from custody.
6

7 In their Answer (ECF No. 25), Respondents concede that (1) they cannot remove
8 Petitioner to Russia or Azerbaijan, the countries designated for removal; and (2) the
9 Armenian Consulate, as a third country alternative, will not be issuing a travel document
10 to Petitioner. As a result, Petitioner has shown that there is no likelihood that he will be
11 removed in the reasonably foreseeable future, and Respondents are unable to rebut that
12 showing.
13

14 The Court has previously concluded that the Petition is likely to succeed on the merits.
15 ECF No. 18 at 5-7. Now, even Respondents appear to agree that Petitioner’s removal from the
16 United States is *not* reasonably foreseeable. Petitioner has been detained by ICE for nearly eight
17 months, well beyond the presumptively reasonable six-month period identified in *Zadvydas*, 533
18 U.S. at 701. As such, Petitioner’s ongoing detention violates Petitioner’s Fifth Amendment right
19 to due process and the Immigration and Nationality Act, 8 U.S.C. § 1231(a)(6). For all of the
20 reasons stated in the Petition and supported by the accompanying documents (ECF Nos. 1, 20,
21 23), *Zadvydas* compels Petitioner’s release from custody.
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3 Dated: July 17, 2025

Respectfully submitted,

4 By: /s/ Irene C. Freidel

Irene C. Freidel

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CERTIFICATE OF SERVICE

I, Irene C. Freidel, hereby certify that the foregoing document was served on Respondents' counsel on this 17th day of July, 2025 via the ECF platform.

/s/ Irene C. Freidel
Irene C. Freidel