

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

MAHDEJIAN

Petitioner,

v.

BRADFORD, *et al.*

Respondents.

**RESPONSE TO ORDER TO SHOW
CAUSE**

Case No. 1-25-CV-00341-MAC-CLS

RESPONSE TO ORDER TO SHOW CAUSE

In response to the Court's Order to Show Cause, Dkt. 11, Petitioner consents to the transfer of this case to the Lufkin Division and regrets inadvertently filing this case in the incorrect division. Petitioner has conferred with counsel for Respondents, who is likewise unopposed to transfer.

Pending a ruling from the Lufkin Division on Petitioner's application for a temporary restraining order, we request that this Court order that the status quo be maintained with respect to Petitioner's physical presence in the United States. Dkt. 10; *see also Stewart v. Dunn*, 363 F.2d 591, 598 (5th Cir. 1966) ("The law is clear that pending a decision on the question of jurisdiction, a District Court has the power to issue a temporary restraining order in order to preserve existing conditions.").

July 2, 2025

Respectfully submitted,

/s/ Ashley L. Kaper

Ashley Kaper

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CERTIFICATE OF CONFERENCE

I hereby certify that on July 2, 2025, I spoke with AUSA James Gillingham who is unopposed to transfer of venue to the Lufkin Division.

/s/ Ashley L. Kaper

Ashley Kaper

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2025, I electronically filed the foregoing Response to Order to Show Cause with the Clerk of the Court using the CM/ECF system, and served a copy of such filing via electronic mail upon:

/s/ Ashley L. Kaper

Ashley Kaper