DISTRICT JUDGE RICARDO S. MARTINEZ
MAGISTRATE JUDGE MICHELLE L. PETERSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VIKTOR BORISOVICH TAIROV, Petitioner, v. PAMELA BONDI, *et al.*, Respondents.	No. CV25-01558-MLP-RSM SUPPLEMENTAL MEMORANDUM REGARDING MR. TAIROV'S DETENTION STATUS

Viktor Tairov, through undersigned counsel, submits this supplemental pleading to update the Court on the status of his continued detention.

On October 29, 2025, when Mr. Tairov filed his Response to Respondent's Habeas Return/Motion to Dismiss, Dkt. 11, his most recent detention had extended for nearly five months. As of the date of this filing, he has been detained for 182 days, which is longer than the "grace period" contemplated by statute, by the Supreme Court, or by the Ninth Circuit for the government to coordinate and carry out a final order of removal. *See Kim Ho Ma v. Ashcroft*, 257 F.3d 1095, 1102 n.5 (9th Cir. 2001) (internal citations omitted).

The November 5, 2025, noting date has passed and the government filed no reply to Mr. Tairov's response to its Motion to Dismiss, nor has it submitted any additional evidence that Mr. Tairov's removal is reasonably foreseeable. Neither Mr. Tairov nor undersigned counsel has received any information that would indicate that his removal is any more likely than it has been for the last two decades.

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Mr. Tairov asks the Court to grant his petition and order his immediate release.

DATED this 2nd day of December 2025.

Respectfully submitted,

s/ *Sara Brin*
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