

1 TODD BLANCHE
United States Deputy Attorney General
2 SIGAL CHATTAH
First Assistant United States Attorney
3 District of Nevada
Nevada Bar No. 8264

4 SUMMER A. JOHNSON
5 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
6 Phone: (702) 388-6336
Fax: (702) 388-6336
7 Summer.Johnson@usdoj.gov
Attorneys for the Federal Respondents

8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 Vardan Gukasian,
11 Petitioner,
12 v.
13 Kristi Noem, et al.,
14 Respondents.

Case No. 2:25-cv-01697-JAD-DJA
**Federal Respondents' Response to
Petitioner's Motion for Reconsideration
of Court's Order Dismissing Civil-
Rights Claims
(ECF No. 35)**

15
16 Federal Respondents do not oppose Petitioner's Motion for Reconsideration as it
17 relates to the limited relief requested.

18 However, Federal Respondents' non-opposition should not be interpreted as a
19 concession on the merits of the Petition for Writ Of Habeas Corpus and Complaint for
20 Injunctive and Declaratory Relief or as a waiver of any applicable defenses, including
21 but not limited to those available under Federal Rule of Civil Procedure 12(b).
22 Respondents will present any and all such arguments, as applicable, in their response to
23 the Petition for Writ of Habeas Corpus in accordance with the Court's scheduling order.

24 Respectfully submitted this 18th day of November 2025.

25 TODD BLANCHE
United States Deputy Attorney General
26 SIGAL CHATTAH
First Assistant United States Attorney
27 /s/ Summer A. Johnson
SUMMER A. JOHNSON
28 Assistant United States Attorney

