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7
8 UNITED STATES DISTRICT COURT
9
10 FOR THE DISTRICT OF ARIZONA
11

12 Mehrdad Rowshandel,
13
14 Petitioner-Plaintiff,

15 v.

16 John Cantu, Field Office Director of Phoenix
17 Office of Detention and Removal, U.S.
18 Immigrations and Customs Enforcement; U.S.
19 Department of Homeland Security;

20 Todd M. Lyons, Acting Director, Immigration
21 and Customs Enforcement, U.S. Department of
22 Homeland Security;

23 Kristi Noem, in her Official Capacity, Secretary,
24 U.S. Department of Homeland Security; and

25 Pam Bondi, in her Official Capacity, Attorney
26 General of the United States;

27 Fred Figueroa, Warden, Eloy Detention Center

28 Respondents-Defendants.

Case No. 2:25-cv-03470-DWL-
-ESW



**PETITIONER'S REPLY TO
COURT'S ORDER OF
12/15/2025**

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Petitioner accepts the Respondents' concession and agrees to be released under an order of supervision.

Regarding the other relief that he has sought in the Petition:

- (1) "Declare that ICE's June 22, 2025, apprehension and detention of Mr. Rowshendal was an unlawful exercise of authority because the ICE officer provided no reason that he presents a danger to the community or is flight risk";
- (2) "Enjoin re-arresting Mr. Rowshendal unless and until a hearing can be held before a neutral adjudicator to determine whether his re-incarceration would be lawful because the government has shown that he is a danger or a flight risk by clear and convincing evidence";
- (3) "Declare that Mr. Rowshendal cannot be re-arrested unless and until he is afforded a hearing on the question of whether his reincarceration would be lawful—i.e., whether the government has demonstrated to a neutral adjudicator that he is a danger or a flight risk by clear and convincing evidence";
- and (4) "Refrain from deporting Petitioner to a third country."

Petitioner withdraws those requests from the Court at this time, and asks that those be withdrawn without prejudice.

Respectfully submitted, on December 17th, 2025.

/s/ Siovhan Ayala
Siovhan Ayala
Attorney for Petitioner