

1 Ashkan Yekrangi [SBN 276211]
2 Yekrangi & Associates
3 1 Park Plaza, Suite 600
4 Irvine, CA 92614
5 Ph: (949) 285-1836
6 Fx: (949) 271-2355
7 ashkan@yeklaw.com
8 Attorney for Petitioner

9 UNITED STATES DISTRICT COURT FOR THE
10 CENTRAL DISTRICT OF CALIFORNIA

11 Trung Dang Mai

12 Petitioner,
13 v.

14 Mark Bowen, Warden of the Adelanto Detention
15 Facility

16 in his official capacity,
17 Respondent.

Case 5:25-CV-02707-PA-MAR

PETITIONER'S REPLY TO
GOVERNMENT'S
OPPOSITION TO
TEMPORARY
RESTRAINING ORDER

Honorable Percy Anderson

United States District Judge

1
2 **INTRODUCTION**

3 Petitioner was initially detained and released pursuant to *Zadvydas v. Davis*,
4 533 U.S. 678 (2001) in 2004. Petitioner was re-detained in 2006 and again released
5 by ICE pursuant to *Zadvydas*. Dkt 5-1. Most recently, on September 24, 2025,
6 Petitioner was detained again for the *third time* by ICE. Dkt. 7-1, ¶ 8. The decision
7 to re-detain Petitioner was based on “changed circumstances in [his] case. ICE has
8 determined there is a significant likelihood of removal in the reasonably foreseeable
9 future.” Dkt. 7-2 “Notice of Revocation.”

10 8 C.F.R. § 241.4(b)(4) explicitly states that the procedures of § 241.4 “*do not*
11 *apply*” to an alien, like Petitioner, who was released pursuant to a § 241.13
12 (*Zadvydas*) determination. The government has failed to comply with the
13 *mandatory* revocation procedures required by 8 C.F.R. § 241.13(i)(3) rendering
14 Petitioner's detention unlawful from its inception.

15 The revocation procedure outlined at 8 C.F.R. § 241.13(i)(3) requires: (1)
16 notification of the reasons of revocation; (2) a prompt informal interview; and (3)
17 an opportunity to respond to the reasons of revocation and an evaluation of any
18 contested facts.

19
20 The government's failure to follow its own procedures is unlawful. Recent
21 on-point decisions from this and other districts compels release.

1 **ARGUMENT**

2 **I. PETITIONER HAS ESTABLISHED A STRONG LIKELIHOOD OF**
3 **SUCCESS ON THE MERITS**
4

5 To obtain a temporary restraining order, Petitioner must establish “that he is
6 likely to succeed on the merits, that he is likely to suffer irreparable harm in the
7 absence of preliminary relief, that the balance of equities tips in his favor, and that
8 an injunction is in the public interest.” *Winter v. Nat. Res. Def. Council, Inc.*, 555
9 U.S. 7, 20 (2008). The Ninth Circuit employs a “sliding scale” standard, under
10 which “serious questions going to the merits” and a balance of hardships that “tips
11 sharply toward the plaintiff” can support an injunction. *All. for the Wild Rockies v.*
12 *Cottrell*, 632 F.3d 1127, 1131 (9th Cir. 2011). Petitioner has met this standard.

13 **A. Respondent’s Re-Detention Is Unlawful for Failure to Comply with**
14 **Mandatory Agency Regulations.**

15 **1. Petitioner’s Release and Re-Detention Are Governed by 8 C.F.R. § 241.13**
16

17 Petitioner, a pre-1995 Vietnamese national was previously released on two
18 occasions because his removal was not reasonably foreseeable. His release was, by
19 law, a *Zadvydas* release governed by 8 C.F.R. § 241.13. The regulations prohibit
20 Respondent's actions when it chose to re-detain him without any likelihood of
21 removal.

1 8 C.F.R. § 241.4(b)(4) explicitly states: “The custody review procedures in this
2 section *do not apply* after the Service has made a determination, pursuant to the
3 procedures provided in 8 CFR § 241.13, that there is no significant likelihood that
4 an alien . . . can be removed in the reasonably foreseeable future” *Id.* (emphasis
5 added). This is further affirmed under 8 CFR § 241.13 which notes:

6
7 Section 241.4 shall continue to govern the detention of aliens under a final
8 order of removal, including aliens who have requested a review of the
9 likelihood of their removal under this section, *unless* the Service makes a
10 determination under this section that there is no significant likelihood of
11 removal in the reasonably foreseeable future. *Id.* 8 CFR § 241.13(b)(1).

12 Because Petitioner's prior release was such a § 241.13 determination, the plain
13 text of § 241.4(b)(4) legally bars Respondent from using the discretionary
14 procedures of § 241.4. The *only* lawful path to revoke Petitioner's release is via 8
15 C.F.R. § 241.13(i). This section provides only two grounds for revocation: (1)
16 violation of release conditions (which is not alleged in the Notice of Revocation);
17 or (2) “on account of changed circumstances . . . that there is a significant
18 likelihood that the alien may be removed in the reasonably foreseeable future.” 8
19 C.F.R. § 241.13(i)(2).

20 Importantly, Respondent's own “Notice of Revocation of Release,” provided to
21 Petitioner, notes:

1 . . . [Y]our order of supervision has been revoked . . . This decision has been
2 made based on a review of your official alien file and a determination that there
3 are *changed circumstances in your case*. ICE has determined that there is a
4 significant likelihood of removal in the reasonably foreseeable future. . . . You
5 will *promptly be afforded an informal interview at which you will be given an*
6 *opportunity to respond to the reasons for the revocation*. If you are not
7 released after the informal interview, you will receive notification of a new
8 review, which will occur approximately three months of the date of this notice.
9 See Dkt 7-2 (emphasis added).

10
11 The Notice of Revocation of Release is important. It is evidence that the
12 Government failed to follow its own procedures, namely, by providing a prompt
13 informal interview and an opportunity to respond. Indeed, Petitioner's sworn
14 statement and Deportation Officer (DO) Jenson's declaration clearly indicate that
15 no formal or informal interview has taken place. See Dkt 5-1; Dkt 7-1. To date,
16 Petitioner has never been given an opportunity to respond to the reasons of
17 revocation, in violation of the regulations.

18
19 **2. Controlling Precedent from This and Other Districts Compels Release**

20 A chorus of courts within this district and across the nation compel release for
21 ICE's failure to follow its own regulations. "In simpler terms, in order to revoke
release, the government must notify the noncitizen of the reason for the revocation

1 and give them both an informal and formal interview.” *Delkash v. Noem*, No. 5:25-
2 cv-01675-HDV-AGR, 2025 WL 2683988, at *4 (C.D. Cal. Aug. 28, 2025); *Bui v.*
3 *Warden of Otay Mesa Detention Facility*, No. 25-cv-2111-JES-DEB, 2025 WL
4 2988356, at *4 (S.D. Cal. Oct. 23, 2025); *Esmail v. Noem*, 2:25-cv-08325-WLH-
5 RAO, 2025 WL 3030590, at *5 (C.D. Cal. Sept. 12, 2025); *Yang v. Kaiser*, No.
6 2:25-cv-02205-DAD-AC (HC), 2025 WL 2791778, at *6 (E.D. Cal. Aug. 20, 2025)
7 (similar); *M.S.L. v. Bostock*, No. 6:25-cv-01204-AA, 2025 WL 2430267, at *4, 10–
8 11 (D. Or. Aug. 21, 2025); *Sarail A. v. Bondi*, No. 25-cv-2144-ECT-JFD, 2025 WL
9 2533673, at *2, 10 (D. Minn. Sept. 3, 2025).

10
11 Respondent cites *Long Ton v. Noem* 5:25-cv-02033-SB-AGR and *Morales*
12 *Sanchez v. Bondi* 5:25-cv-02530-AB-DTB to suggest this Court deny relief.

13 The court in *Long Ton v. Noem*, 5:25-cv-02033-SB-AGR, denied relief for
14 because the petitioner had provided an “absence of evidence.” *Id.* As that court
15 noted, counsel conceded, “I just have the absence of evidence.... I have nothing.”
16 Here, in stark contrast, Petitioner has provided a mountain of affirmative evidence,
17 including the Notice of Revocation promising the Petitioner Due Process which to
18 date, has not been provided. Petitioner’s own declaration and Deportation Officer
19 Jenson’s declaration indicate no interview has taken place. In addition, the data-
20 rich *Trinh v. Homan* reports and the comprehensive Expert Declaration of Dr. Thao
21

1 Ha regarding the difficulty of removal for pre-1995 Vietnamese arrivals support the
2 removal of Petitioner is indeed, unlikely. *See* Dkt 1, Ex. E; Dkt 5-1, Ex. L.

3
4 *Morales Sanchez v. Bondi*, 5:25-cv-02530-AB-DTB, is even less relevant.
5 That case involved a Mexican national granted withholding of removal, where the
6 main arguments involved the officer's *authority* to revoke supervision.

7 The correct line of authority include *Delkash v. Noem*, 5:25-cv-01675-HDV-
8 AGR, *Nam Su Hoang v. Santa Cruz*, EDCV 25-2766 JGB (JCx) (2025), *Quoc Chi*
9 *Hoac v. Becerra*, (2025) 2:25-cv-01740-DC-JDP and many others which compel
10 release. *See, e.g., McSweeney v. Warden of Otay Mesa Det. Facility*, No. 3:25-CV-
11 02488-

12 In *Nam Su Hoang v. Santa Cruz*, 5:25-cv-02766, a recent, similar case where a
13 TRO was granted under similar circumstances for a pre-1995 Vietnamese national,
14 refutes the government's narrative. In *Hoang*, the court noted:

15
16 The government responds that there is now a significant likelihood of removal
17 to Vietnam. The evidence the government proffers in support of that argument
18 is that the "government is requesting [Petitioner's] travel documents."

19 However, the Court agrees with Petitioner that the government has not
20 established that it is any more likely to acquire those travel documents than it
21 has since it issued Petitioner's removal order in 2000. *Id.*

1 In *Quoc Chi Hoac v. Becerra*, (2025) 2:25-cv-01740-DC-JDP the court found
2
3 that the Petitioner was likely to succeed on his claim that Respondents cannot
4 demonstrate changed circumstances such that there is now a significant likelihood
5 Petitioner will be removed to Vietnam in the reasonably foreseeable future. *Id.* at
6 10. Specifically, the Respondents reliance on a “changed circumstance” vis-à-vis
7 Vietnam was refuted by the court:

8 The fact that Respondents intend to complete a travel document request for
9 Petitioner does not make it significantly likely he will be removed in the
10 foreseeable future. . . . However, Respondents have not provided any details
11 about why a travel document could not be obtained in the past, nor have they
12 attempted to show why obtaining a travel document is more likely this time
13 around. Respondents’ intent to eventually complete a travel document request
14 for Petitioner does not constitute a changed circumstance. *Id.* at 11.

15 Other cases within this district and across the nation facing similar facts have
16 been ordered released. *Hassanzadeh v. Warden*, Civ. No. 5:25-cv-02113-DMG-
17 MAA CD. Cal (Nov. 25, 2025); *M.S.L. v. Bostock*, Civ. No. 6:25-cv-01204-AA,
18 2025 U.S. Dist. LEXIS 162519, 2025 WL 2430267, at *11 (D. Or. Aug. 21, 2025)
19 (finding an informal interview given 27 days after petitioner was taken into ICE
20 custody “cannot reasonably be construed as . . . prompt” and granting habeas
21 petition); *Yuhua Yang v. Kaiser*, No. 2:25-cv-02205-DAD-AC (HC), 2025 U.S.

1 Dist. LEXIS 196161, 2025 WL 2791778, at *5 (E.D. Cal. Aug. 20, 2025) (finding
2 “the failure to provide an informal interview during that lengthy [two-month]
3 period of time renders petitioner's re-detention unlawful”).

4
5 Both § 241.4 and § 241.13 were intended “to provide due process protections
6 to [noncitizens] following the removal period as they are considered for continued
7 detention, release, and then possible revocation of release.” *Orellana v. Baker*,
8 Civil Action No. 25-1788-TDC, 2025 U.S. Dist. LEXIS 164986, 2025 WL
9 2444087, at *6 (D. Md. Aug. 25, 2025); *Rokhfirooz v. Warden*, 2025 U.S. Dist.
10 LEXIS 180605, 2025 WL 2646165, at *4; *Rombot v. Souza*, 296 F. Supp. 3d 383,
11 387-88 (D. Mass. 2017) (ordering the petitioner released where, “[b]ased on ICE's
12 violations of its own regulations, the Court concludes [the petitioner's] detention
13 was unlawful”); *Grigorian v. Bondi*, CASE NO. 25-cv-22914-RAR, 2025 U.S.
14 Dist. LEXIS 175489, 2025 WL 2604573, at *10 (S.D. Fla. Sept. 9, 2025) (“The
15 failure to provide [the petitioner] with an informal interview promptly after his
16 detention or to otherwise provide a meaningful opportunity to contest the reasons
17 for revocation violates both ICE's own regulations and the Fifth Amendment Due
18 Process Clause. This compels [the petitioner's] release.”); *Roble v. Bondi*, 2025
19 U.S. Dist. LEXIS 164108, 2025 WL 2443453, at *5 (D. Minn. Aug. 25, 2025)
20 (ordering petitioner's “release from custody as a remedy for ICE's illegal re-
21 detention”); *Van Nguyen v. Hyde*, 2025 U.S. Dist. LEXIS 117495, 2025 WL

1 1725791, at *5 (D. Mass. June 20, 2025) (holding that because ICE violated “its
2 own regulations. . . [petitioner’s] detention is unlawful and that his release is
3 appropriate”); *Zongbo Zhu, v. Warden*, 2025 U.S. Dist. LEXIS 166176, 2025 WL
4 2452352, at *9 (holding that “ICE’s failure to follow its own regulations and
5 provide Petitioner with notice or an interview violated Petitioner’s procedural due
6 process rights.”).

7
8 **B. Respondent’s Detention Violates *Zadvydas* Because Petitioner’s Removal Is**
9 **Not Reasonably Foreseeable.**

10 Respondent’s substantive justification for “changed circumstances” under §
11 241.13(i)(2) is legally insufficient because no circumstances have changed.

12 **1. Petitioner Has Met His *Zadvydas* Burden with Unrebutted Evidence.**

13
14 Petitioner has met his burden to show removal is not reasonably foreseeable.
15 He has submitted the expert declaration of Dr. Thao Ha, who establishes that
16 removal for pre-1995 refugees is “uncertain and protracted.” Dkt 5-1, Ex. L. Dr.
17 Ha details the formidable obstacles, including lack of birth certificates, linguistic
18 barriers, and complex consular procedures . This is corroborated by data from the
19 *Trinh v. Homan* litigation, which shows that even when removals occur, they
20 follow “prolonged” and “unpredictable” periods of detention. *Id.*

1 Petitioner is unlikely to be removed by the vary terms of the Memorandum
2 of Understanding (MOU) between the United States and Vietnam, which limits
3 repatriation. Dkt 5-1, Ex. K. Specifically, the MOU limits removal to those with
4 Vietnamese Citizenship and prior residence in Vietnam. *Id.* at Section 4 of MOU.
5 Petitioner holds no Vietnamese passport, was born in the Philippines and has never
6 resided in Vietnam. Dkt. 5-1, p. 46.

7
8 Under these vary terms, Petitioner is ineligible for repatriation to Vietnam.

9 **2. *Zadvydas* Presumption is Rebuttable and There is No Requirement for Six**
10 **Months To Pass**

11 Multiple courts have concluded that the *Zadvydas* six-month presumption is
12 rebuttable. *See, e.g., Munoz-Saucedo v. Pittman*, No. 25-2258-CPO, 2025 U.S.
13 Dist. LEXIS 120414, 2025 WL 1750346, at *5-6 (D.N.J. June 24, 2025) (collecting
14 cases); *Ali v. Dep't of Homeland Security*, 451 F. Supp. 3d 703, 707 (S.D. Tex.
15 2020) (holding that the “six-month presumption is not a bright line” and that
16 *Zadvydas* “did not require a detainee to remain in detention for six months . . .
17 before a habeas court could find that the detention is unconstitutional”); *Hoang*
18 *Trinh v. Homan*, 333 F. Supp. 3d 984, 994 (CD. Cal. 2018) (“The Supreme Court in
19 *Zadvydas* outlined a ‘guide’ for approaching these detention challenges . . . not a
20 prohibition on claims challenging detention less than six months.” (quoting
21 *Zadvydas*, 533 U.S. at 700-01)); *Cesar v. Achim*, 542 F. Supp. 2d 897, 905 (E.D.

1 Wis. 2008) (concluding that “while detention pursuant to § 1231(a)(6) for up to six
2 months is presumptively lawful, an alien may still state a claim for and demonstrate
3 a constitutional violation within the six-month window”); *Medina v. Noem*, No.
4 25-1768-ABA, 2025 U.S. Dist. LEXIS 154052, 2025 WL 2306274, at *6 (D. Md.
5 Aug. 11, 2025) (noting that “what *Zadvydas* did make clear was that it was
6 adopting a presumption—not a conclusive bar to adjudication of whether continued
7 detention is authorized that lifts only after six months have elapsed”); *see also*
8 *Cordon-Salguero v. Noem*, No. 25-1626-GLR, Mot. Hr’g Tr. at 35-37 (D. Md. June
9 18, 2025) (stating that the *Zadvydas* presumption is rebuttable); *See, also, Nguyen*
10 *v. Hyde*, No. 25-11470-MJJ, 2025 U.S. Dist. LEXIS 117495, 2025 WL 1725791, at
11 *3 (D. Mass. June 20, 2025) (concluding that the six-month presumptively
12 reasonable period was not applicable in a case, like here, “about ICE’s authority to
13 re-detain [a noncitizen] after he was issued a final order of removal, detained, and
14 subsequently released on an OSUP” rather than “ICE’s authority to detain in the
15 first place upon an issuance of a final order of removal as in *Zadvydas*”); *Ruiz*
16 *Primero v. Mattivelo*, No. 25-11442-IT, 2025 U.S. Dist. LEXIS 130195, 2025 WL
17 1899115, at *5 (D. Mass. July 9, 2025) (distinguishing *Zadvydas* as addressing the
18 issue of indefinite detention rather than an initial detention decision and finding that
19 the Government could not “rely on the presumptive period of permissible
20 detention” established in *Zadvydas*); *see also Guillermo M. R. v. Kaiser*, No. 25-
21 05436-RFL, 2025 U.S. Dist. LEXIS 175897, 2025 WL 1983677, at *5 (N.D. Cal.

1 July 17, 2025) (“*Zadvyd*das provided no instruction for what process is necessary to
2 protect non-citizens' liberty interest when the government seeks to return them to
3 custody.”).

4
5 Petitioner has met his burden to show removal is not significantly likely or
6 even foreseeable. Petitioner’s removal order became administratively final in
7 2004. The 90 day removal period has long since passed. The government placed
8 him on an Order of Supervision because it knew that Petitioner could not be
9 deported. Regardless, the government chose to re-detain him despite no likelihood
10 of removal, in violation of implementing regulations.

11 Despite a request for travel documents “pending,” Petitioner languishes in
12 detention. If removal is “reasonably foreseeable” as *Zadvyd*das requires, the
13 government should have been able to deport him by now.

14 Petitioner’s removal is not foreseeable or even significantly likely. 8 CFR §
15 241.13 allows re-detention when there is “*significant likelihood* that the alien may
16 be removed in the reasonably foreseeable future.” 8 CFR § 241.13 (emphasis
17 added).

18
19 The fact Petitioner remains in custody is evidence that removal is indeed,
20 unlikely. On these facts, *Zadvyd*das compels release when removal is not
21 reasonably foreseeable, and Petitioner has rebutted this presumption.

1 Respondent also relies on *Huynh v. Semaia, et al.*, 2:24-cv-10901-MRA-DFM,
2 *Le Van Minh v. DHS*, 5:25-CV-02245-HDV-JDE (Aug 18, 2025), and *Tan Minh Vo*
3 *v. DHS*, 5:25-CV-02791-SVW-MBK as evidence to show a “significant likelihood
4 of removal.” *Le Van Minh* involved a two page habeas petition not involving a
5 temporary restraining order and solely challenging an “indefinite detention” rather
6 than procedural Due Process Violations. *Tan Minh Vo* involved the same. None
7 of these cases involve facts similar to Petitioner, who holds no Vietnamese passport
8 or birth certificate, never resided in Vietnam, and was born in a refugee camp in the
9 Philippines.

10
11 Respondents' reliance on these cases do not aid the court's analysis on whether
12 there are changed circumstances. Pre-1995 Vietnamese immigrants may be
13 repatriated to Vietnam on “a case-by-case basis.” *Hoi Thanh Duong v. Tate*, No.
14 24-cv-04119-H, 2025 U.S. Dist. LEXIS 57056, 2025 WL 933947, at *4 (S.D. Tex.
15 Mar. 27, 2025) (quoting *Trinh v. Homan*, 466 F. Supp. 3d 1077, 1083 (C.D. Cal.
16 2020)). Vietnam has discretion whether to issue a travel document to any
17 individual. Three factually dissimilar cases are not helpful in deciding this matter.
18 *Wing Nuen Liu*, 2025 U.S. Dist. LEXIS 115275, 2025 WL 1696526, at *2 (finding
19 that “a single example of documentation being received in March from the Chinese
20 Embassy for one Chinese alien is hardly persuasive” to demonstrate changed
21 circumstances).

1 In fact, Respondent's own evidence proves Petitioner's point. DO Jensen
2 admits he requested travel documents on October 23, 2025— *a month after*
3 Petitioner was detained. Dkt 7-1. This concession confirms Dr. Ha's conclusion
4 that the process is "protracted" and "uncertain" and that removal is not "imminent"
5 or "foreseeable."

6
7 **C. The Imminent Threat of Punitive, Unlawful Third-Country Removal Is a**
8 **Live Controversy.**

9 Respondent dismisses the threat of third-country removal as "irrelevant" and
10 "speculative." This is disingenuous. The threat is memorialized in Respondent's
11 own official policy, the March 30, 2025 DHS Memo which authorizes removal to
12 third countries *without* procedural safeguards. Dkt 5-1, 115.

13
14 **II. PETITIONER AND HIS FAMILY ARE SUFFERING SEVERE AND**
15 **IMMEDIATE IRREPARABLE HARM**

16 **A. The Deprivation of Petitioner's Constitutional Liberty Is *Per Se* Irreparable**
17 **Harm.**

18 Respondent's claim that Petitioner has not shown irreparable harm is legally
19 wrong. Petitioner's unlawful detention is a "deprivation of constitutional rights"
20 which "unquestionably constitutes irreparable injury." *Melendres v. Arpaio*, 695
21 F.3d 990, 1002 (9th Cir. 2012) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)).

1 “Unlawful detention certainly constitutes ‘extreme or very serious’ damage, and
2 that damage is not compensable in damages.” *Hernandez v. Sessions*, 872 F.3d 976,
3 999 (9th Cir. 2017).

4
5 **B. Respondent Ignores the Specific, Documented, and Catastrophic Harm to**
6 **Petitioner’s U.S. Citizen Family.**

7 Respondent’s Opposition fails to rebut—or even acknowledge—the specific,
8 severe medical and psychological harm Petitioner’s re-detention is inflicting on his
9 U.S. citizen family. This harm is documented in multiple declarations and medical
10 reports, most importantly, to his severely autistic son who relies on his father and is
11 facing significant hardships as a result of his father’s detention. Dkt 5-1, Ex. B
12 through J.

13 **III. THE BALANCE OF EQUITIES AND THE PUBLIC INTEREST**
14 **DEMAND IMMEDIATE RELIEF**

15
16 The final two *Winter* factors “merge when the Government is the opposing
17 party.” *Nken v. Holder*, 556 U.S. 418, 435 (2009). The balance tips sharply in
18 Petitioner’s favor. The harm to Petitioner is the unconstitutional deprivation of his
19 liberty. The harm to his U.S. citizen family is a quantifiable, immediate health
20 crisis.

1 The harm to Respondent is *nil*. Respondent “cannot reasonably assert that it
2 is harmed in any legally cognizable sense by being enjoined from constitutional
3 violations.” *Zepeda v. I.N.S.*, 753 F.2d 719, 727 (9th Cir. 1983). The “status quo
4 ante litem” for a person on 24 years of supervision is *freedom*. The public interest
5 is served by “prevent[ing] violations of the U.S. Constitution” and ensuring that
6 powerful agencies like ICE follow their own binding regulations. *Melendres*, 695
7 F.3d at 1002.

8
9 **IV. CONCLUSION**

10 For the foregoing reasons, Petitioner respectfully requests that this Court
11 GRANT the Application for a Temporary Restraining Order, order Petitioner’s
12 immediate release from custody, and grant the other relief requested in Petitioner’s
13 proposed order.

14
15 Dated: December 4, 2025

Respectfully submitted,

16 /s/ Ashkan Yekrangi

17 Ashkan Yekrangi, Esq.
18 *Counsel for Petitioner*
19
20
21

1
2 **CERTIFICATE OF COMPLIANCE WITH L.R. 11-6.2**

3 The undersigned, counsel of record for Respondent, certifies that the memorandum
4 of points and authorities contains 3,455 words, which complies with the word limit
5 of L.R. 11-6.1.

6 Dated: December 4, 2025

/s/ Ashkan Yekrangi

7 ASHKAN YEKRANGI, ESQ.
8
9
10
11
12
13
14
15
16
17
18
19
20
21