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

10 Peejman Shadalo,

11 Petitioner,

12 v.

13 John Mattos, NSDC Warden; Michael
 Bernacke, Field Director, West Valley City
 Office of ICE ERO; Todd Lyons, ICE
 14 Acting Director; Kristi Noem DHS
 Secretary; Pam Bondi, U.S. Attorney
 15 General,

16 Respondents.
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Case No. 2:25-cv-02076-RFB-BNW

**Federal Respondents' Non-Opposition
 to the First Amended Petition, ECF
 No. 10**

18 Federal Respondents, through undersigned counsel, respectfully submit this
 19 statement of non-opposition to the First Amended Petition, ECF No. 10. This non-
 20 opposition is limited to the portion of the Petition addressing whether there is a significant
 21 likelihood of removal in the reasonably foreseeable future ("SLRRFF"). *See e.g.*, ECF No.
 22 10, at 15–17 (Grounds I, II).

23 Based on the posture of this case, the current record, and the documentary evidence
 24 presently available in this litigation, Federal Respondents do not oppose relief narrowly
 25 limited to the issue of Petitioner's SLRRFF. Opposition on that discrete issue would not
 26 materially advance resolution of the case on the existing record, and non-opposition avoids
 27 unnecessary litigation while preserving Federal Respondents' ability to address the
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1 remaining issues presented in the Petition, should relevant facts or circumstances materially
2 change at a later time.

3 This non-opposition is limited in scope. Federal Respondents do not concede the
4 legal validity of Petitioner's remaining arguments, and they do not waive any defenses or
5 arguments regarding any other aspect of the Petition. Federal Respondents expressly
6 reserve all rights to oppose any broader relief and to litigate the issue of Petitioner's
7 SLRRFF in a different posture, at a later date, and/or on a more developed record, should
8 that opportunity arise.

9 Accordingly, Federal Respondents respectfully do not oppose relief limited to the
10 issue of Petitioner's current SLRRFF and otherwise preserve all rights and arguments they
11 may assert in response to the Petition. Federal Respondents recognize that this limited non-
12 opposition resolves the Petition in its present posture.

13 Respectfully submitted this 13th day of January 2026.

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15 SIGAL CHATTAH
16 First Assistant United States Attorney

17 /s/ Christian R. Ruiz
18 CHRISTIAN R. RUIZ
19 Assistant United States Attorney
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