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8 UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF ARIZONA
10 PHOENIX DIVISION

11 Sarkis Shaltapour

12 Petitioner-Plaintiff,

13 v.

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

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

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

23 Pam Bondi, in her Official Capacity, Attorney
24 General of the United States;

25 Respondents-Defendants.

No. 2:25-cv-03995-DWL-CDB

**RESPONSE TO ORDER TO
SHOW CAUSE**

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RESPONSE TO ORDER TO SHOW CAUSE

1 Counsel for Petitioner Sarkis Shaltapour responds to the Order to Show Cause, filed
2 November 20, 2025, as follows:

3 1. Mr. Shaltapour, through counsel, served the Respondents in this matter by certified
4 U.S. Mail on November 21, 2025. (See Exhibit 1.) Counsel apologizes to the Court for the
5 delay in complying with its October 29, 2025 Order to do so “immediately.” Counsel is a sole
6 practitioner, and his paralegal began a medical leave unexpectedly on November 1, 2025.

7 Counsel then inadvertently failed to promptly serve the Respondents as ordered.

8 2. Counsel understands that the Court may impose an appropriate sanction on his office.
9 The failure to immediately serve the Respondents as ordered was not the fault of the Petitioner,
10 but of his counsel. The Petitioner should not be prejudiced by his counsel’s inadvertent failure
11 to comply with the October 28, 2025 Order.

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13 Dated November 23, 2025

Respectfully submitted,

/s/ Clifford Levenson

Clifford Levenson

Attorney for Petitioner

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