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10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF ARIZONA**

12 Sarkis Shaltapour,

13 Petitioner,

14 v.

15 John Cantu, *et al.*,

16 Respondents.

No. CV-25-03995-PHX-DWL (CDB)

**RESPONSE TO PETITION FOR  
WRIT OF HABEAS CORPUS**

18 Respondents, by and through counsel, hereby respond to the Petition for a Writ of  
19 Habeas Corpus (Doc. 1). Undersigned counsel is unable to ascertain sufficient facts at  
20 this time to establish that there is a “significant likelihood of removal in the reasonably  
21 foreseeable future.” *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). Accordingly,  
22 Respondents do not oppose Petitioner’s request for release at this time.

23 Respectfully submitted on December 15, 2025.

24  
25 TIMOTHY COURCHAINED  
26 United States Attorney  
27 District of Arizona

28 *s/Brooks Chupp*  
BROOKS CHUPP

Assistant United States Attorney  
*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of December, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing.

*s/M. Beickert*  
United States Attorney's Office