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13 *Attorneys for Respondents*

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

12 Boris Matatov,¹

13 Petitioner,

14 v.

15 R. Jones, *et al.*

16 Respondents.
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No. CV-25-04211-PHX-MTL (CDB)

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

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

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28 ¹ The official case caption spells Petitioner’s last name “Matator.” Based on the Petition and the declaration submitted by Respondents, this appears to be a scrivener’s error, and Petitioner’s last name is properly spelled “Matatov.”

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RESPECTFULLY SUBMITTED December 29, 2025.

TIMOTHY COURCHAINED
United States Attorney
District of Arizona

s/ Brooks Chupp
BROOKS CHUPP
Assistant United States Attorney
Attorneys for Respondents

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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 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