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*Attorneys for Respondents*

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

Kamel Maklad,  
  
Petitioner,  
  
v.  
  
Christopher Howard, *et al.*,  
  
Respondents.

No. CV-25-04285-PHX-JJT (JFM)

**JOINT STATUS REPORT**

Petitioner and Respondents hereby file this Joint Status Report to update the Court on the results of the meet-and-confer that the Court ordered on November 20, 2025 (Doc. 7). Counsel for Petitioner and counsel for Respondents conferred on November 21, 2025, and the parties have agreed to conduct discovery following the agreement in *Eshaghian v. Howard*, No. 25-CV-04141-PHX-DWL.

In his Motion for Limited Discovery (Doc. 3), Petitioner requested five categories of discovery, which are reproduced below:

1. Mr. Maklad’s entire A-file;
2. A transcript (or, failing that, a recording) of any and all hearings in Mr. Maklad’s case before the immigration courts that led to his being ordered removed from the United States;

- 1 3. Any and all requests from ICE to any diplomatic representative of the Syrian Arab  
2 Republic pertaining to travel documents that would “facilitate” Mr. Maklad’s  
3 removal to Iran, and any responsive or related correspondence to or from those  
4 diplomatic representatives pertaining to these requests for travel documents;
- 5 4. Any and all documents relating to the periodic custody reviews described in 8  
6 C.F.R. § 241.4 for all periods of time that Mr. Maklad has been in ICE custody;  
7 and
- 8 5. Any and all documents relating to any determination under 8 C.F.R. § 241.13 and  
9 8 C.F.R. § 241.14 regarding whether there is a significant likelihood of removing  
10 Mr. Maklad in the reasonably foreseeable future.

11  
12 Doc. 3 at 2–3.

13 In accordance with the *Eshaghian* agreement, counsel for Petitioner and counsel  
14 for Respondents agreed on a resolution for all five categories of requested production.  
15 The resolution is detailed below:

- 16 1. Petitioner agreed to narrow this request to “any and all documents, not otherwise  
17 specifically requested, in Petitioner’s A-File that pertain to Respondents’ ability to  
18 remove Mr. Maklad in the reasonably foreseeable future, specifically including  
19 documents that relate to prior or current removal efforts.” Respondents do not  
20 object to this request.
- 21 2. Petitioner agreed that he will no longer seek production of his transcripts from his  
22 immigration court proceedings since they are not relevant to this habeas  
23 proceeding.
- 24 3. Respondents agreed to determine whether they have any communications that are  
25 responsive to this request. If any responsive documents exist, counsel for  
26 Respondents agreed that he will review them for privilege expeditiously and will  
27 confer again with counsel for Petitioner if he intends to assert any privilege.
- 28 4. Petitioner and Respondents agree that Respondents will produce any finalized

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periodic custody reviews.

5. Petitioner and Respondents agree that Respondents will produce any final, formal determinations that are responsive to this request.

Respondents agree to produce discovery as quickly as possible, but no later than December 5, 2025, when Respondents' response to Petitioner's Motion for a Preliminary Injunction (Doc. 4) is due.

RESPECTFULLY SUBMITTED on November 24, 2025.

TIMOTHY COURCHAINED  
United States Attorney  
District of Arizona

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

JON M. SANDS  
Federal Public Defender

*s/Keith J. Hilzendeger (with permission)*  
KEITH J. HILZENDEGER  
Assistant Federal Public Defender  
*Attorney for Petitioner Maklad*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this November 24, 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