

1 TIMOTHY COURCHAINE  
2 United States Attorney  
3 District of Arizona  
4 BROOKS CHUPP  
5 Assistant United States Attorney  
6 Arizona State Bar No. 040231  
7 Two Renaissance Square  
8 40 North Central Avenue, Suite 1800  
9 Phoenix, Arizona 85004-4449  
10 Telephone: (602) 514-7500  
11 Fax: (602) 514-7760  
12 Email: brooks.chupp@usdoj.gov  
13 *Attorneys for Respondents*

14 **IN THE UNITED STATES DISTRICT COURT**

15 **FOR THE DISTRICT OF ARIZONA**

16 Kamel Maklad,

17 Petitioner,

18 v.

19 Christopher Howard, *et al.*,

20 Respondents.

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

**RESPONSE TO MOTION FOR  
PRELIMINARY INJUNCTION AND  
PETITION FOR WRIT OF HABEAS  
CORPUS**

21 Respondents, by and through counsel, hereby respond to the Petition for a Writ of  
22 Habeas Corpus (Doc. 1) and the Motion for a Preliminary Injunction (Doc. 4).  
23 Undersigned counsel is unable to ascertain sufficient facts at this time to establish that  
24 there is a “significant likelihood of removal in the reasonably foreseeable future.”  
25 *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). Accordingly, Respondents do not oppose  
26 Petitioner’s request for release at this time.

27 ///

28 ///

///

///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

RESPECTFULLY SUBMITTED on December 5, 2025.

TIMOTHY COURCHAINED  
United States Attorney  
District of Arizona

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

**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 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