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8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 Kambiz Bakhtiari,
 11 Petitioner,
 12 v.
 13 John Mattos, NSDC Warden; Michael
 Bernacke, Field Director, West Valley City
 14 Office of ICE ERO; Todd Lyons, ICE
 Acting Director; Kristi Noem DHS
 15 Secretary; Pam Bondi, U.S. Attorney
 General,
 16 Respondents.

Case No. 2:25-cv-02346-APG-NJK

**Federal Respondents' Omnibus Non-
 Opposition to Amended Petition, ECF
 No. 7 and Motion for Temporary
 Restraining Order, ECF No. 9**

18 Federal Respondents, through undersigned counsel, respectfully submit this
 19 Omnibus Non-Opposition to Petitioner's Amended Petition (ECF No. 7) and Motion for
 20 Temporary Restraining Order, ECF No. 9. This non-opposition is limited to the portion of
 21 the Petition and Motion for Temporary Restraining Order addressing whether there is a
 22 significant likelihood of removal in the reasonably foreseeable future ("SLRRFF"). *See e.g.*,
 23 ECF No. 7, at 6-13 (Grounds I, II), ECF No. 9, at 6-7 (Grounds I, II).

24 Based on the posture of this case, the current record, and the documentary evidence
 25 presently available in this litigation, Federal Respondents do not oppose relief narrowly
 26 limited to the issue of Petitioner's SLRRFF. Opposition on that discrete issue would not
 27 materially advance resolution of the case on the existing record, and non-opposition avoids
 28 unnecessary litigation while preserving Federal Respondents' ability to address the

1 remaining issues presented in the Petition, should relevant facts or circumstances materially
2 change at a later time.

3 This non-opposition is expressly limited in scope. Federal Respondents do not
4 concede the legal validity of Petitioner's remaining arguments and do not waive any
5 defenses or arguments with respect to any other aspect of the Petition or the Motion for
6 Temporary Restraining Order. Federal Respondents expressly reserve all rights to oppose
7 any broader or different relief and to litigate issues related to Petitioner's SLRRFF in a
8 different procedural posture, on a more developed record, or at a later stage of these
9 proceedings (if any), should that become appropriate.

10 Accordingly, Federal Respondents do not oppose relief limited solely to Petitioner's
11 current SLRRFF, while preserving all other rights and arguments available in response to
12 the Petition. This limited non-opposition is intended to resolve the Petition and the Motion
13 for Temporary Restraining Order only as they are presently framed and does not extend
14 beyond that narrow issue.

15 Respectfully submitted this 20th day of January 2026.

17 TODD BLANCHE
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21 /s/ Summer A. Johnson
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