

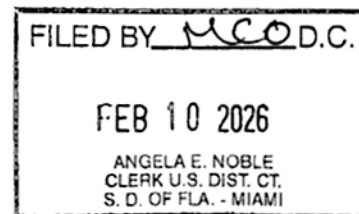
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 0:25-cv-62457-JB
KARIM SOUDBAKHSH,

Petitioner,

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, et al.,

Respondents.



PETITIONER'S REPLY TO GOVERNMENT'S RESPONSE TO AMENDED PETITION FOR WRIT OF HABEAS CORPUS

Petitioner, **Karim Soudbakhsh**, respectfully submits this Reply to the Government's Response to the Amended Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241.

I. INTRODUCTION

The Court has accepted the Amended Petition, signed directly by Petitioner, curing the standing issue identified in the Court's prior order. The case is now properly before the Court for review on the merits.

The Government's Response relies on factual inaccuracies and speculative assertions regarding thirdcountry removal, and it fails to demonstrate a significant likelihood of removal in the reasonably foreseeable future as required under *Zadvydas v. Davis*, 533 U.S. 678 (2001).

II. STANDING IS FULLY RESOLVED

The Government's argument regarding "next friend" standing is now moot. The Amended Petition is signed by Petitioner himself, satisfying 28 U.S.C. § 2242. No further inquiry into standing is required.

III. WITHHOLDING OF REMOVAL BARS REMOVAL TO IRAN

The Government correctly notes that withholding of removal does not confer lawful immigration status. However, withholding **does** legally prohibit removal to Iran. DHS must therefore identify a lawful receiving country before removal can occur.

The Government has not identified any such country.

IV. THE GOVERNMENT'S CLAIM ABOUT REMOVAL TO THE UNITED ARAB EMIRATES IS FACTUALLY INCORRECT

The Government asserts that Petitioner "previously had residency" in the United Arab Emirates (UAE) and therefore removal there is "not unreasonable." This is incorrect for the following reasons:

A. The UAE does not grant permanent residency to foreign nationals

According to the official UAE Federal Decree-Law No. 29 of 2021 on the Entry and Residence of Foreigners, the UAE does not provide permanent residency to foreign nationals. Residency is granted only through temporary permits tied to sponsorship, which can be terminated. There is no pathway to permanent residency

for non-citizens. This is confirmed by the UAE government's official immigration regulations and embassy statements, as detailed in the law available here:

Federal Decree-Law No. 29 of 2021 on Entry and Residence of Foreigners

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B. Sponsorship terminates automatically when the sponsor cancels or dies

Petitioner's prior sponsor in the UAE is **deceased**. Under UAE law, this automatically terminates any residency or work authorization.

C. Petitioner has no remaining ties or sponsors in the UAE

Petitioner has:

- No employer sponsor,
- No individual sponsor,
- No family sponsor,
- No legal pathway to re-enter the UAE.

D. DHS provided no evidence of any current acceptance by the UAE

The Government has not produced:

- Any communication with UAE authorities,
- Any diplomatic inquiry,
- Any letter of acceptance,
- Any evidence of a sponsor,
- Any visa pathway.

The Government's argument is **pure speculation**, which is insufficient under *Zadvydas*.

V. REMOVAL IS NOT REASONABLY FORESEEABLE

Under *Zadvydas*, detention beyond six months is presumptively unreasonable unless DHS shows a significant likelihood of removal in the reasonably foreseeable future.

Petitioner was detained on **June 25, 2025**. His detention is approaching the sixmonth threshold, and by the time the Court rules, it will likely exceed it.

Even before six months, courts may grant relief where removal is clearly not foreseeable. Here:

- Removal to Iran is legally prohibited.
- Removal to the UAE is legally impossible.
- No other country has been identified.

The Government has not met its burden.

VI. CONCLUSION

For the reasons stated above, Petitioner respectfully requests that the Court:

1. Grant the Amended Petition for Writ of Habeas Corpus
2. Order Petitioner's immediate release under reasonable supervision; and
3. Grant any further relief the court deems just and proper.

Respectfully submitted

KARIM SOUDBAKHSH

Petitioner, pro se

At 

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CERTIFICATE OF SERVICE

I certify that on 02/05/, 2026, I mailed a copy of this Reply to

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KARIM SOUDBAKHSH