

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

DAVID ZARATE SANCHEZ,

Petitioner,

v.

KRISTI NOEM, et al.,

Respondents.

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CIVIL NO. 4:25-cv-5767

**THE GOVERNMENT'S SUPPLEMENTAL BRIEFING**

Pursuant to the Court's Order for supplemental briefing (Dkt. No. 11), the Government<sup>1</sup> hereby responds with the following information:

Petitioner David Zarate Sanchez has no known criminal history.

Dated: January 9, 2026

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<sup>1</sup> The proper respondent in a habeas petition is the person with custody over the petitioner. 28 U.S.C. § 2242; *see also* § 2243; *Rumsfeld v. Padilla*, 542 U.S. 426, 435 (2004). That said, it is the originally named federal respondents, not the named warden in this case, who make the custodial decisions regarding aliens detained in immigration custody under Title 8 of the United States Code.

Respectfully submitted,

NICHOLAS J. GANJEI  
United States Attorney

By: /s/ Lisa Luz Parker  
Lisa Luz Parker, Attorney-in-Charge  
Assistant United States Attorney  
Texas Bar No. 24099248  
Southern District No. 3495931  
1000 Louisiana, Suite 2300  
Houston, Texas 77002  
Tel: (713) 567-9489  
Fax: (713) 718-3303  
E-mail: lisa.luz.parker@usdoj.gov

**CERTIFICATE OF SERVICE**

I certify that on January 9, 2026, the foregoing was filed and served on counsel of record through the Court's CM/ECF system.

/s/ Lisa Luz Parker  
Lisa Luz Parker  
Assistant United States Attorney