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Attorneys for Respondents

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

IMRAN HOSSAIN,

Petitioner,

v.

WARDEN OF THE GOLDEN STATE
ANNEX ICE DETENTION FACILITY, et al.,

Respondents.

CASE NO. 1:25-CV-01710-JLT-SAB
SUPPLEMENTAL BRIEF RE REMOVAL

On March 13, 2026, the Court ordered the respondents to file “a supplemental brief detailing the steps they have taken, if any, to plan for Petitioner’s third country removal and/or to give him notice thereof.” Order for Suppl. Briefing 3, Dkt. No. 18.

I. RESPONSE

As described in further detail in the attached exhibits, immigration authorities recently obtained a travel permit to remove petitioner Imran Hossain to his home country of Bangladesh. *See* Decl. Deportation Officer Farshid Moradi Kouchi ¶ 7, Dkt. No. 19-1. This travel permit is valid until approximately the end of April, and immigration authorities are presently arranging for a commercial flight to effectuate Hossain’s removal within that time. *Id.* ¶¶ 7–8.

Based on the above facts, the respondents’ position is that Hossein is not entitled to release or to a bond hearing because his removal is imminent. *See Aleman Gonzalez v. Barr*, 955 F.3d 762, 784 (9th

1 Cir. 2020) (noting that prior Ninth Circuit authority’s “construction of § 1231(a)(6) to require a bond
2 hearing does not apply if an alien’s release or removal is imminent”), *rev’d sub nom. Garland v. Aleman*
3 *Gonzalez*, 596 U.S. 543 (2022). Furthermore, immigration authorities are preparing to remove Hossain
4 to his home country of Bangladesh, not to any third country to which he has no connection. Kouchi
5 Decl. ¶ 8.

6 For those reasons, the respondents believe that the Court should deny Hossain’s habeas petition
7 and allow immigration authorities to remove him, consistent with federal immigration law.
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10 Dated: March 19, 2026

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12 By: /s/ SAM STEFANKI
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