

1 Rene L. Valladares
 Federal Public Defender
 2 Nevada State Bar No. 11479
 3 *Ryan Norwood
 Assistant Federal Public Defender
 4 Pennsylvania State Bar No. 332919
 *Laura Barrera
 5 Assistant Federal Public Defender
 Michigan State Bar No. P80957
 6 411 E. Bonneville Ave., Ste. 250
 7 Las Vegas, Nevada 89101
 (702) 388-6577
 8 Ryan_norwood@fd.org

9
 10 *Attorneys for Petitioner Reza Tehrani
 11

12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

14 Reza Tehrani,
 15 Petitioner,
 16 v.
 17 John Mattos, *et al.*,
 18 Respondents.

Case No. 2:25-cv-02389-APG-EJY
**Supplement to Reply to
 Respondents' Response to Petition
 for Writ of Habeas Corpus (ECF
 No. 16)**

19
 20
 21 As noted in the Reply filed on February 4, 2026, Mr. Tehrani was set to have
 22 an appointment with Immigrations and Customs Enforcement (ICE) on February 5,
 23 2026, at which he was told conditions of supervision may be imposed as a result of
 24 his release on bond. Mr. Tehrani went to that appointment, and ICE did indeed
 25 impose conditions, including significant restrictions that have not been previously
 26 imposed on him, specifically:

- 27 1. Mr. Tehrani must wear an ankle monitoring bracelet at all times;

1 2. Mr. Tehrani may not leave the State of Nevada without permission from
2 ICE.

3 Additionally, ICE still has not returned Mr. Tehrani's state identification or
4 phone, which were seized at the time of his arrest.

5 As set forth in detail in the Reply, Mr. Tehrani's underlying detention was
6 unlawful and he should be entitled to release notwithstanding his payment of a
7 bond. Furthermore, the habeas petition is not moot, in part because of the
8 possibility that the government might impose new and more restrictive conditions
9 of supervision because of the bond – as they have now done. The imposed conditions
10 are significant new restrictions on Mr. Tehrani's freedom, who is diabetic and has
11 high blood pressure, and whose family, including his sister and his children, all live
12 outside of Nevada.

13 **CONCLUSION**

14 For all the reasons set forth here and in prior pleadings, Mr. Tehrani
15 respectfully requests the Court grant him relief as set forth in this Reply.

16
17 Dated February 6, 2026.

18
19 Respectfully submitted,

20 Rene L. Valladares
21 Federal Public Defender

22 /s/ Ryan Norwood

23 Ryan Norwood
24 Assistant Federal Public Defender
25
26
27