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9 **UNITED STATES DISTRICT COURT**  
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11  
12 RAMUDIN MOHAMMADI ,

13 Petitioners,

14 v.

15 CHRISTOPHER LAROSE, et al,

16 Respondents.  
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Case No.: 3:25-cv-3450-JES-BJW

**SUPPLEMENTAL BRIEFING**

1 On December 12, 2025, the Court ordered that Respondent provide Petitioner with  
2 a bond determination under 8 U.S.C. § 1226(a) within ten days of the Order, ruling that  
3 “Respondents may not deny Petitioner bond on the basis that he is detained under 8 U.S.C.  
4 § 1225(b)(2).” ECF No. 7 at 7 (“the Order”). Petitioner’s bond hearing before an  
5 Immigration Judge is currently scheduled for Monday, January 5, 2026. After the bond  
6 redetermination hearing, Respondents will file a notice of compliance and apprise the Court  
7 of the results of the hearing by Saturday, January 10, 2026.

8 In the Order, the Court also directed the parties to file supplemental briefing  
9 regarding the original conditions of Petitioner’s humanitarian parole. *Id.* at 8. According to  
10 attached declaration of U.S. Immigration and Customs Enforcement Deportation Officer  
11 Hugo Lara Ramirez, based his review of government databases and documentation relating  
12 to the Petitioner, “On August 28, 2021, Petitioner was granted parole into the United States  
13 under Operation Allies Refuge (OAR) with admission valid until August 27, 2025. I am  
14 not aware of any conditions or limitations placed on Petitioner’s parole under OAR.”<sup>1</sup>

15 It is the Respondent’s position, therefore, that Petitioner’s parole expired on August  
16 27, 2025, thereby forming the basis of his detention on November 28, 2025.

17 Nonetheless, because the Court has already ordered a bond redetermination hearing,  
18 which is currently scheduled to occur on January 5, 2026, Respondents’ position is that this  
19 Court need not resolve this factual issue or grant any additional relief.

20 DATED: January 2, 2026

ADAM GORDON  
United States Attorney

21 *s/Robbin O. Lee*  
22 Robbin O. Lee  
23 Assistant United States Attorney  
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27 <sup>1</sup> U.S. Immigration and Customs Enforcement did not provide Respondents’ counsel a  
28 copy of Petitioner’s original I-94 form.