


UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

_____	)	
Teang Liu,	)	
	)	
<i>Petitioner,</i>	)	
	)	Civil Action No. <u>2:25-cv-04532-DWL-JZB</u>
v.	)	
	)	
Luis Rosa Jr., <i>Warden, Florence Correctional</i>	)	
<i>Center</i>	)	
	)	
Kristi Noem, <i>Secretary of Homeland Security,</i>	)	PETITION FOR WRIT OF
	)	HABEAS CORPUS
Todd Lyons, <i>Acting Director, U.S. Immigration</i>	)	
<i>and Customs Enforcement,</i>	)	
	)	
Pamela Bondi, <i>Attorney General,</i>	)	A 
	)	
Christopher McGregor, <i>Acting Field Office Director</i>	)	
<i>Phoenix Field Office, Immigration</i>	)	
<i>and Customs Enforcement,</i>	)	
	)	
<i>Respondents.</i>	)	
_____	)	

**PETITIONER'S RESPONSE TO RESPONDENT'S NON-OPPOSITION TO RELEASE**

**PETITION FOR WRIT OF HABEAS CORPUS**

1. Petitioner Teang Liu has been detained in immigration custody at the Florence Correctional Center in Florence, Arizona since approximately August 26, 2025.
2. Petitioner filed this *habeas corpus* petition before this Honorable Court on December 8, 2025. (ECF No. 1). The petition set forth the reasons why Petitioner's detention is unlawful. *See Id.* at paragraphs 41-54.
3. On December 10, 2025, the Honorable Dominic W. Lanza issued an Order requiring the Respondents to respond to the Petition by December 18, 2025. (ECF No. 3).

4. In timely response to the Order, Respondents filed a Statement of Non-Opposition to Release in Response to Petition for Writ of Habeas Corpus, in which they acknowledge that they are “unable to ascertain sufficient facts at this time to establish that there is a “significant likelihood of removal in the reasonably foreseeable future.” *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001).” (ECF No. 8). As such, the Respondents do not oppose Petitioner’s request for release at this time.

5. The December 10, 2025 Order of this Honorable Court also requires any reply by the Petitioner to the Respondents’ response to be filed by December 19, 2025. Petitioner timely files this reply. Given the non-opposition by the Respondents to the Petitioner’s release, he hereby renews the following requests for relief set forth below, with modifications and additions indicated in bold.

#### **REQUEST FOR RELIEF**

Petitioner prays for judgment against Respondents and respectfully requests that the Court enters an order:

- a) Preliminarily and permanently enjoining Respondents from removing Petitioner to China, unless and until his order of Deferral of Removal is terminated, including all appeals;
- b) Preliminarily and permanently enjoining Respondents from removing Petitioner to any other country without first providing him notice and offering him adequate opportunity to apply for protection under the Convention Against Torture as to that country, including immigration judge review;
- c) Setting aside the revocation of Petitioner’s Order of Supervision, and restoring him to his Order of Supervision;

- d) Issuing a writ of *habeas corpus*, and ordering that Petitioner be released from physical custody, **no later than December 25, 2025**;
- e) **Ordering that Petitioner not be detained again in the future unless there is significant likelihood of removal in the reasonably foreseeable future, and or a procedurally proper revocation of an Order of Supervision, as set forth in the relevant regulations;**
- f) Granting Petitioner his costs of suit; and
- g) Granting such other relief at law and in equity as justice may require.

Respectfully submitted,

/s/ Elizabeth A. Kohler Maya  
Elizabeth A. Kohler Maya, Esq.  
Virginia State Bar no. 48467  
Counsel for Petitioner  
Jezic & Moyse, LLC  
2730 University Boulevard West, Suite 604  
Wheaton, Maryland 20902  
Telephone: 240-292-7200  
[ekohler@jezicfirm.com](mailto:ekohler@jezicfirm.com)

Date: December 19, 2025

**Certificate of Service**

I, Elizabeth A. Kohler Maya, hereby certify that on this 19<sup>th</sup> day of December, 2025, I uploaded the foregoing, with all attachments thereto, to this court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all case participants.

Civil Process Clerk  
U.S. Attorney's Office for the District of Arizona  
2 Renaissance Square  
40 Central Avenue, Suite 1800  
Phoenix, AZ 85004

Office of the General Counsel  
U.S. Department of Homeland Security  
245 Murray Lane, SW, Mail Stop 0485  
Washington, DC 20528-0485

Pamela Bondi, Attorney General of the United States  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
500 12th Street SW, Mail Stop 5902  
Washington, DC 20536-5902

/s/ Elizabeth A. Kohler Maya  
Elizabeth A. Kohler Maya, Esq.  
Virginia State Bar no. 48467  
*Pro Hac Vice Admission*  
Counsel for Petitioner  
Jezic & Moyse, LLC  
2730 University Boulevard West, Suite 604  
Wheaton, Maryland 20902  
Telephone: 240-292-7200  
[ekohler@jezicfirm.com](mailto:ekohler@jezicfirm.com)