


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>)	
)	
Christopher McGregor, <i>Acting Field Office Director</i>)	
<i>Phoenix Field Office, Immigration</i>)	
<i>and Customs Enforcement,</i>)	
)	
<i>Respondents.</i>)	
_____)	

**PETITIONER’S AMENDED RESPONSE TO
RESPONDENT’S NON-OPPOSITION TO RELEASE**

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. (Doc. 1). The petition set forth the reasons why Petitioner’s detention is unlawful. *See Id.* at 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. (Doc. 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).” (Doc. 8). As such, the Respondents do not oppose Petitioner’s request for release at this time.

5. Petitioner timely filed a reply in which he renewed his requests for relief set forth in the petition with a modification adding a date certain by which he would be released as well as an additional request. (Doc. 9, at d-e).

6. On December 20, 2025 this Honorable Court issued an Order requiring Petitioner to submit supplemental briefing by December 22, 2025 addressing whether he believes he remains entitled to any additional relief beyond the relief that Respondents have now conceded is appropriate (and if so, why). (Doc. 10).

7. Petitioner now files this amended reply in response to the Order dated December 20, 2025, confirming that he is satisfied with the Respondents’ concession and will decline to provide any supplemental briefing in support of his additional requestions for relief, such that this Honorable Court may issue a writ of *habeas corpus*, and order Petitioner immediate release from physical custody, under appropriate safeguards.

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

Date: December 21, 2025

Certificate of Service

I, Elizabeth A. Kohler Maya, hereby certify that on this 21st 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