

1 TODD BLANCHE
Deputy Attorney General
2 BILAL A. ESSAYLI
First Assistant United States Attorney
3 DAVID M. HARRIS
Assistant United States Attorney
4 Chief, Civil Division
DANIEL A. BECK
5 Assistant United States Attorney
Chief, Complex and Defensive Litigation Section
6 ALFREDO J. BONILLA (NM Bar No. 146669)
Special Assistant United States Attorney
7 3403 Tenth Street, Suite 200
Riverside, California 92501
8 Telephone: (213) 940-2221
E-mail: Alfredo.Bonilla@usdoj.gov
9

10 Attorneys for Federal Respondents

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13

14 MA JINGYI,

15 Petitioner,

16 v.

17 TODD M. LYONS, et al.,

18 Respondents.
19
20
21
22
23
24
25
26
27
28

No. 5:25-cv-03345-RGK-SSC

**FEDERAL RESPONDENTS' REPLY IN
SUPPORT OF MOTION TO DISMISS**

**[Filed concurrently with Exh. 1,
Highlighted A-Number]**

Honorable Stephanie S. Christensen
United States Magistrate Judge

1 On January 26, 2026, Petitioner, through counsel, filed a Reply In Support Of
2 Petition For Writ Of Habeas Corpus And Opposition To Espondents' [sic] Motion To
3 Dismiss [Dkt. No. 10], along with a Motion For Temporary And Preliminary Injunctive
4 Relief In Aid Of Habeas Jurisdiction [Dkt. No. 11]. These filings rest on the assertion by
5 Petitioner's counsel that Respondents relied on the wrong A-Number/Alien Registration
6 Number/Alien Number (A-Number or A#)¹ in filing our Motion to Dismiss and
7 accompanying exhibits [Dkt. No. 9]. See Dkt. Nos. 10-11. That assertion is meritless.

8 Every filing from Petitioner, including the Petition [Dkt. No. 1] and the two (2)
9 above-mentioned filings [Dkt. Nos. 10-11], identifies Petitioner by A-number 202-197-
10 084. See Exh. 1, Highlighted A-Number.

11 The A-number [REDACTED] was used and relied upon by Respondents to obtain
12 Department of Homeland Security ("DHS") records and custody information to file their
13 Motion to Dismiss and accompanying exhibits [Dkt. No. 9]. Petitioner's counsel cannot
14 fault Respondents for relying on the operative A-number he himself placed on every cover
15 page of every pleading he has filed in this action, Exh. 1.

16 Immigration custody and identity are determined by A-number, not by name alone
17 (as numerous detainees share the same name), and Respondents are entitled to rely on the
18 A-number affirmatively provided by counsel. Any confusion regarding Petitioner's
19 identity, detention location, or record is the result of counsel's own inconsistent and
20 careless² filings and cannot supply a basis for habeas or injunctive relief. *Id.*

21 ///

22
23
24
25
26 ¹ A unique seven-, eight- or nine-digit number that the Department of Homeland
Security assigned to an alien. See <https://www.uscis.gov/glossary-term/50684>

27 ² The summons attached to the Petition shows the name "[REDACTED]"
28 an individual with no apparent connection to the Petition or to the claims
asserted therein. Dkt. No. 1 at 14. This additional discrepancy further reflects the lack of
care in Petitioner's filings, which has resulted in unnecessary confusion and delay. *Id.*

