

- 1 1. On December 13, 2025, Arpinch Kamali-Masihi (Petitioner), through
2 undersigned counsel filed a petition for habeas corpus. Petitioner is detained
3 by respondents at the Adelanto ICE Processing Center
- 4 2. An Order to Show Cause (ECF No. 12) was issued on December 19, 2025,
5 directing Respondents to file a response within 7 hours after the date of the
6 Order.
- 7 3. On December 19, 2025, the Honorable Court ordered the respondents within
8 three days after the date of the order to file a Notice of Appearance and if a
9 TRO is not filed, Respondents shall, within 7 days after this date of this order
10 file a response to the Petition.
- 11 4. Respondents have failed to comply with the Court's Order dated December 18,
12 2025, requiring them to file a Notice to Appear and a response as mandated by
13 28 U.S.C. § 2243 and Local Habeas Rule 2254-29(d).
- 14 5. As of this date, Respondents have also failed to file a response as required by
15 the Court's Order. 28 U.S.C. § 2243 requires immediate action or show cause
16 orders and prompt responses. In accordance with this federal mandate, as well
17 as Central District of California Local Habeas Rule 2254-29(d), Respondents
18 are obligated to file timely response.
- 19 6. The Respondent's delay in filing an answer undermines the progress of this
20 case and prejudices Petitioner's ability to obtain a prompt resolution, contrary
21 to the intent of expedited habeas review.
- 22 7. This delay prejudices Petitioner by preventing progress toward resolution.
- 23 8. Respondents continued non-compliance warrant for further relief.

24 **Prayer for Relief:**

25 Petitioner respectfully requests that the Court to:

- 26 (1) Issue an order compelling Respondent to file their response within 5 days
27 after the date of this Order
- 28 (2) Grant any other and further relief that this Court deems just and proper.

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I declare under penalty of perjury that the information is true and correct.

Dated: December 31, 2025

Respectfully submitted,

//Neda Zaman//

Neda Zaman
Attorney for Petitioner

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CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that I filed this Notice of Respondents' Non-Compliance and Request to Enforce the Order to Show Cause and all attachments using the CM/ECF system, which will send notice of this filing to all participants in this case.

Dated: December 31, 2025

//Neda Zaman//

Neda Zaman
Attorney for Petitioner

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