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 12
 13 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

14 Noorullah Fayazi,

15 Petitioner,

16 v.

17 John Mattos, NSDC Warden; Michael
 18 Bernacke, Field Director, West Valley City
 Office of ICE ERO; Todd Lyons, ICE
 19 Acting Director; Kristi Noem DHS
 Secretary; Pam Bondi, U.S. Attorney
 20 General, *et al.*,

21 Respondents.

Case No. 2:25-cv-02480-APG-DJA

**Reply in Support of Petition for
 Writ of Habeas Corpus**

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 23 Petitioner Noorullah Fayazi, through undersigned counsel, files this reply to
 24 the response to the Petition for Writ of Habeas Corpus¹.

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 27 ¹ See ECF No. 4.

1 Mr. Fayazi reasserts the background and argument relied on in the underlying
2 petition. He agrees with the government's assessment of his deportation status,
3 specifically the government's inability to "provide an anticipated timeframe for
4 Petitioner's removal"² as required in *Zadvydas v. Davis*, 533 U.S. 678 (2001).
5 Considering the length of his detention after being granted CAT, Mr. Fayazi's release
6 from unnecessary detention is necessary.

7 Mr. Fayazi respectfully requests the Court grant his petition and order his
8 release. He requests that any conditions of supervision be reasonable and not more
9 than necessary to meet the goals of supervision outlined in 8 CFR § 241.4. Mr. Fayazi
10 further requests that ICE be given up to 48 hours to arrange for his safe and orderly
11 release, preferably during the daytime.

12 Dated January 16, 2026.

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14 Respectfully submitted,

15 Rene L. Valladares
16 Federal Public Defender

17 /s/ Keisha K. Matthews
18 Keisha K. Matthews
19 Assistant Federal Public Defender


20 /s/ Ashlyn Saenz-Ochoa
21 Ashlyn Saenz-Ochoa
22 Assistant Federal Public Defender

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² See ECF No. 12 at 2:4-5.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on January 16, 2026. I further certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third party commercial carrier for delivery within three calendar days, to the following person:

| | |
|---|--|
| Mohamed Hassan Fayazi,  Nevada Southern Detention Center 2190 E Mesquite Avenue Pahrump, NV 89060 | Kristi Noem Secretary, United States Department of Homeland Security 245 Murray Lane SW Washington, DC 20528 |
| John Mattos Warden Nevada Southern Detention Center 2190 E. Mesquite Ave., Pahrump, NV 89060 | Pam Bondi Attorney General U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-001 |
| Todd Lyons Acting Director U.S. Immigration and Customs Enforcement 500 12th Street SW Washington, DC 20536 | Director Michael Bernacke ICE Enforcement and Removal Operations Field Office 2975 Decker Lake Drive, Suite 100 West Valley City, UT 84119 |
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/s/ Mayra Castillo

An Employee of the
Federal Public Defender

