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3 District of Arizona  
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13 *Attorneys for Respondents*

14 **IN THE UNITED STATES DISTRICT COURT**  
15 **FOR THE DISTRICT OF ARIZONA**

16 Genaro Lopez-Ibarra,  
17  
18 Petitioner,  
19  
20 v.  
21  
22 Pam Bondi, et al.,  
23  
24 Respondents.

No. CV-25-04678-PHX-MTL (CDB)

**STATEMENT OF NON-OPPOSITION  
TO RELEASE IN RESPONSE TO  
PETITION FOR WRIT OF HABEAS  
CORPUS**

**THE GOVERNMENT DOES NOT OPPOSE PETITIONER’S RELEASE**

25 Respondents, by and through counsel, hereby respond to the Petition for a Writ of  
26 Habeas Corpus (Doc. 1). Undersigned counsel is unable to ascertain sufficient facts at  
27 this time to establish that there is a “significant likelihood of removal in the reasonably  
28 foreseeable future.” *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). Accordingly,  
Respondents do not oppose Petitioner’s request for release at this time.

Respectfully submitted on January 2, 2026.

TIMOTHY COURCHAINED  
United States Attorney  
District of Arizona

/s/ Lindsey E. Gilman  
LINDSEY E. GILMAN


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Assistant United States Attorney  
*Attorneys for Respondents*

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2026, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and mailed the attached to the following individuals who are not registered participants of the CM/ECF System:

Genaro Lopez-Ibarra  
Central Arizona Florence Correctional Complex  
A#   
P.O. Box 6300  
Florence, Arizona 85132

s/ Lindsey E. Gilman  
United States Attorney's Office