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10 **IN THE UNITED STATES DISTRICT COURT**
 11 **FOR THE DISTRICT OF ARIZONA**

12 Jorge Lopez Sainz,

13 Petitioner,

14 v.

16 Luis Rosa, Jr., *et al.*,

17 Respondents.

No. CV-25-04670-PHX-JJT (JFM)

**RESPONSE TO PETITION FOR
 WRIT OF HABEAS CORPUS**

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

23 Respectfully submitted on January 2, 2026.

25 TIMOTHY COURCHAINED
 United States Attorney
 District of Arizona

26 *s/Brooks Chupp*
 27 BROOKS CHUPP
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Assistant United States Attorney
Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of January, 2026, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing.

s/B. Chupp
United States Attorney's Office