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Attorney for Petitioner

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

RICARDO CHUZON HERNA,	)	CASE NO. 1:25-CV-01919-JLT-SAB
	)	
Petitioner	)	PETITIONER'S RESPONSE TO
	)	RESPONDENTS' EVIDENCE
vs.	)	
	)	
TODD LYONS, Acting Director,	)	
Immigration and Customs	)	
Enforcement; KRISTI NOEM,	)	
Secretary of United States	)	
Department of Homeland Security;	)	
SERGIO ALBARRAN, Field	)	
Office Director of Enforcement and	)	
Removal Operations, San	)	
Francisco Field Office,	)	
CHRISTOPHER CHESTNUT,	)	
Warden, California City	)	
Correctional Facility, PAMELA	)	
BONDI, United States Attorney	)	
General,	)	
	)	
Respondents	)	
	)	

Petitioner hereby responds to the evidence submitted by Respondents regarding the alleged ATD violation by submitting an affidavit from Petitioner's partner, Emmanuel Melendez, detailing the circumstances of the ATD violation.

Respectfully submitted,

Date: January 21, 2026

By: /s/ Arash Yasrebi
Arash Yasrebi
Attorney for Petitioner