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 9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 Seyed Hojjat Azimi Osmavandani,
 11
 Petitioner,
 12 v.
 13 John Mattos, *et al.*,
 14 Respondents.

Case No. 2:26-cv-00008-GMN-BNW

**Federal Respondents' Non-Opposition
 to the First Amended Petition, ECF
 No. 11 and Motion for Temporary
 Restraining Order, ECF No. 13**

15 Federal Respondents, through undersigned counsel, respectfully submit this
 16 statement of non-opposition to the First Amended Petition, ECF No. 11 and the motion for
 17 Temporary Restraining Order, ECF No. 13. This non-opposition is limited to the portion
 18 of the petition addressing whether there is a significant likelihood of removal in the
 19 reasonably foreseeable future ("SLRRFF"). *See e.g.*, ECF No. 11, at 15–18 (Grounds I, II).

20 Based on the posture of this case, the current record, and the documentary evidence
 21 presently available in this litigation, Federal Respondents do not oppose relief narrowly
 22 limited to the issue of Petitioner's SLRRFF. Opposition on that discrete issue would not
 23 materially advance resolution of the case on the existing record, and non-opposition avoids
 24 unnecessary litigation while preserving Federal Respondents' ability to address the
 25 remaining issues presented in the Petition, should relevant facts or circumstances materially
 26 change at a later time.

27 This non-opposition is limited in scope. Federal Respondents do not concede the
 28 legal validity of Petitioner's remaining arguments, and they do not waive any defenses or

1 arguments regarding any other aspect of the Petition. Federal Respondents expressly
2 reserve all rights to oppose any broader relief and to litigate the issue of Petitioner's
3 SLRRFF in a different posture, at a later date, and/or on a more developed record, should
4 that opportunity arise.

5 Accordingly, Federal Respondents respectfully do not oppose relief limited to the
6 issue of Petitioner's current SLRRFF and otherwise preserve all rights and arguments they
7 may assert in response to the Petition. Federal Respondents recognize that this limited non-
8 opposition resolves the Petition in its present posture and renders the Motion for
9 Temporary Restraining Order moot.

10 Respectfully submitted this 5th day of February 2026.

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17 /s/ Martin J. Mayer
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