

briefing appropriate after the Motion is made available. Given the time-sensitive nature of this detention habeas case, Petitioner files this Opposition promptly.

3. Next Friend standing was proper at the time of filing for the reasons set forth in the Next Friend Verification and Declaration filed with the Petition, including Petitioner's detention-related inability to timely review, sign, and return the Petition without significant delay, and Next Friend's close family relationship and dedication to Petitioner's best interests.

4. Petitioner executed a Supplemental Verification from detention on February 3, 2026, confirming that he authorizes the filing of the Petition by Next Friend and adopts the Petition's factual allegations and requested relief.

5. On February 4, 2026, Petitioner submitted two executed copies of the Supplemental Verification to detention staff for mailing to this Court. As of the date of this filing, Next Friend has not received any tracking information and therefore cannot confirm the postmark or delivery date.

6. Upon receipt, Petitioner respectfully requests that the Supplemental Verification be filed.

7. In light of the executed verification, the asserted issues regarding Next Friend status do not establish good cause to stay merits briefing pending any resolution of that issue.

8. Even if questions regarding Next Friend standing were to arise, such issues do not require resolution before Respondents respond to the Petition on the merits. Where the Petitioner has executed a verification adopting the Petition and authorizing its filing, any dispute regarding Next Friend status is non-jurisdictional and does not justify a stay of time-sensitive habeas proceedings.

9. This is a detention habeas case where timing matters, and a stay would prolong detention while providing little or no benefit. Respondents face no meaningful prejudice from responding on the merits by the deadline previously ordered by the Court.

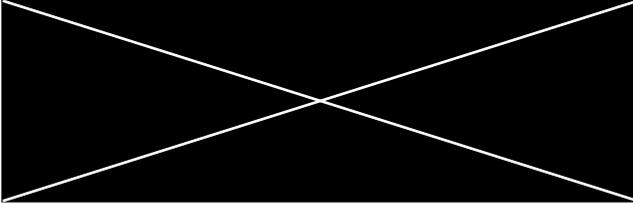
Wherefore, Petitioner respectfully requests that the Court DENY Respondents' Motion to Stay and maintain the existing response deadline previously ordered by the Court.

Dated: February 6, 2026



Avtandil Daushvili,

Next Friend for Petitioner



CERTIFICATE OF SERVICE

I certify that on February 6, 2026, I mailed a true and correct copy of the foregoing Opposition by U.S. Mail, postage prepaid, to:

Robert Don Evans, Jr., Assistant United States Attorney
U.S. Attorney's Office, Western District of Oklahoma
210 W. Park Avenue, Suite 400
Oklahoma City, OK 73102



Avtandil Daushvili,

Next Friend for Petitioner

