

1 Barbara Zalewski-Zaragoza (SBN 346060)
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7 **UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF COLORADO**

9 **HISSEIN SEIRO YAYA**

10 **Petitioner,**

11 **v.**

12 **WARDEN OF THE DENVER CONTRACT**
13 **DETENTION FACILITY, ET AL.,**

14 **Respondents.**

Case No.: 1:26-CV-00332-STV

PETITIONER'S REPLY TO
RESPONDENTS' SUPPLEMENTAL
BRIEFING

15
16 Petitioner, Mr. Hissein Seiro Yaya, through counsel, respectfully stands on his previous
17 briefings. ECF No. 1, 20. Petitioner has been in detention for more than the presumptive six-
18 months after receiving a final order of removal. Furthermore, Petitioner has met his burden to
19 show that there is no significant likelihood of release or removal in the reasonably foreseeable
20 future.
21

22 The Government has not presented any evidence to rebut this showing. The Government
23 has not identified a receiving country, obtained acceptance, or provided any concrete evidence of
24 a removal. ECF No. 18, 24. Instead, their efforts are speculative. Under 8 U.S.C. § 1231,
25 *Zadydas v. Davis*, 533 U.S. 678, 699 (2001), *Soberanes v. Comfort*, 388 F.3d 1305, 1311 (10th
26

1 Cir. 2004), and consistent with District of Colorado precedent, Respondents have not
2 demonstrated that removal is significantly likely in the reasonably foreseeable future.
3

4 Therefore, Petitioner requests this Court:

- 5 1) Grant the Petition for Writ of Habeas Corpus;
- 6 2) Order Petitioner's release under appropriate supervision; and
- 7 3) Deny Respondents' request for additional time.

8 Respectfully submitted this 10th day of March, 2026.
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11 /s/ Barbara Zalewski-Zaragoza

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Certificate of Service

I hereby certify that on March 10, 2026, I filed the foregoing with the Clerk of Court for the District of Colorado using the CM/ECF system.

/s/ Barbara Zalewski-Zaragoza _____

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