

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

ZHUSHAN WANG,

Petitioner,

v.

No. 2:26-cv-00375-DHU-JHR

DORA CASTRO, Warden, Otero County Processing Center; JOEL GARCIA, Field Office Director, El Paso Field Office, Immigration and Customs Enforcement; KRISTI NOEM, Secretary, U.S. Department of Homeland Security; PAMELA BONDI, U.S. Attorney General,

Respondents.

**NOTICE OF COMPLIANCE WITH ORDER [Doc. 4] AND  
JOINDER IN USA RESPONDENTS' FORTHCOMING CLAIMS AND DEFENSES**

Respondent Warden Castro, Warden of the Otero County Processing Center, by and through her attorneys of record, Sutin, Thayer & Browne, a Professional Corporation (Christina Muscarella Gooch), and pursuant to the Court's Order to Show Cause [Doc. 4] entered on February 12, 2026, hereby notifies the Court that she takes no positions separate from the USA Respondents related to the Petition [Doc. 1], and that she hereby joins in the position(s) that the USA Respondents may take related to the Petition and/or other pleadings filed in this matter.

Respectfully submitted,

SUTIN, THAYER & BROWNE  
A Professional Corporation

By /s/ Christina Muscarella Gooch  
Christina Muscarella Gooch

P.O. Box 1945

Albuquerque, NM 87103

Telephone: (505) 883-3433

[tmg@sutinfirm.com](mailto:tmg@sutinfirm.com)

*Attorney for Respondent Warden Castro*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 19, 2026, I filed the foregoing pleading electronically through the CM/ECF system, which caused all parties and counsel of record to be served, as more fully reflected on the Notice of Electronic Filing.

SUTIN, THAYER & BROWNE  
A Professional Corporation

By     /s/ Christina Muscarella Gooch    

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