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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SOHAN LAL Petitioner, v. JEREMY CASEY, Warden of the Imperial Regional Detention Center; TODD LYONS, Acting Director of Immigration and Customs Enforcement; MARKWAYNE MULLIN, Acting Secretary of the U.S. Department of Homeland Security; TODD BLANCHE, Attorney General of the United States Respondents.	Civil No. 3:26-cv-01545-DMS-JLB

Notice of Completion of Briefing and Petitioner's Continued Detention

Petitioner respectfully submits this notice to inform the Court that briefing in this matter is complete and the Petition is fully submitted for decision.

Pursuant to the Court's briefing schedule, Respondents filed their Return on March 23, 2026, and Petitioner timely filed his Reply on March 24, 2026. (ECF Nos. 4, 5).

Despite the completion of briefing, Petitioner remains detained. As set forth in the Petition and Reply, this case challenges the Government's revocation of previously granted liberty without any pre-deprivation process—a constitutional violation that is not remedied by a post hoc bond hearing.

Respondents have acknowledged that individualized process is required by filing a Notice of Non-Opposition to a bond hearing. (ECF No. 4). However, as explained in Petitioner's Reply, that concession does not resolve the due process violation already inflicted, nor does it justify Petitioner's continued detention.

Petitioner therefore remains in custody without constitutionally adequate process while this matter has been fully briefed and pending before the Court. Continued detention under these circumstances constitutes ongoing irreparable harm.

In light of the fully submitted record and Petitioner's continued detention, Petitioner respectfully requests the Court's consideration of the pending Petition.

Dated this 13th day of April, 2026.

/s/ Gurpreet Kaur
Gurpreet Kaur, Esq.
Attorney for Petitioner