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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

ALIREZA DEHGHAN, Petitioner, v. MARKWAYNE MULLIN, et al.,[1] Respondents.	Case No.: 26-cv-01573-BAS-AHG **RESPONSE TO PETITION**

Respondents, by and through counsel, hereby respond to the Petition for Writ of Habeas Corpus. Undersigned counsel is unable to ascertain sufficient facts at this time to establish that there is a significant likelihood of removal in the reasonably foreseeable future. *See Zadvydas v. Davis*, 533 U.S. 678 (2001). Respondents therefore acknowledge that Petitioner is entitled to be released from custody subject to conditions of supervision. *See* 8 U.S.C. § 1231(a)(3); 8 C.F.R. § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-

[1] As the current DHS Secretary, Markwayne Mullin is automatically substituted as the proper Respondent by operation of law.

BJW, 2026 WL 218936, at *1 (S.D. Cal. Jan. 27, 2026) ("The habeas statute does not empower courts to manage ICE supervision programs.") (citing 28 U.S.C. § 2241(c)(3)); *Khachikian v. Casey*, No. 25-cv-3737-GPC-JLB, ECF No. 13 (S.D. Cal. Jan. 13, 2026) ("Ultimately, ICE has discretion to impose conditions on release.").

DATED: March 27, 2026

ADAM GORDON
United States Attorney

s/Cindy M. Cipriani
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Assistant United States Attorney