

1 ADAM GORDON
United States Attorney
2 HUNTER V. NORTON
Assistant United States Attorney
3 D.C. BAR No. 1780736
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: 619-546-8592
Email: Hunter.Norton2@usdoj.gov

6 Attorneys for Respondents

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8 **UNITED STATES DISTRICT COURT**

9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 FARHAD YAHYAPOUR GHAZVINI,

Case No.: 26-cv-01785-LL-DDL

11 Petitioner,

**RETURN TO AMENDED PETITION
FOR WRIT OF HABEAS CORPUS**

12
13 v.

14 PAMELA BONDI, *U.S. Attorney
General, et al*,

15 Respondent.
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19 Respondents, by and through counsel, hereby respond to the Petition for Writ of
20 Habeas Corpus. Undersigned counsel is unable to ascertain sufficient facts at this time to
21 establish that there is a significant likelihood of removal in the reasonably foreseeable
22 future. *See Zadvydas v. Davis*, 533 U.S. 678 (2001). Respondents therefore acknowledge
23 that Petitioner is entitled to be released from custody subject to conditions of supervision.
24 *See* 8 U.S.C. § 1231(a)(3); 8 C.F.R. § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-
25 BJW, 2026 WL 218936, at *1 (S.D. Cal. Jan. 27, 2026) (“The habeas statute does not
26 empower courts to manage ICE supervision programs.”) (citing 28 U.S.C. § 2241(c)(3));
27 *Khachikian v. Casey*, No. 25-cv-3737-GPC-JLB, ECF No. 13 (S.D. Cal. Jan. 13, 2026)

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1 (“Ultimately, ICE has discretion to impose conditions on release.”).

2 DATED: April 15, 2026

ADAM GORDON
United States Attorney

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s/Hunter V Norton

HUNTER V. NORTON
Assistant United States Attorney

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