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8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 YAKUP KILIC,

11 Petitioner,

12 v.

13 MARKWAYNE MULLIN, et al.,

14 Respondents.

Case No.: 26-cv-2182-TWR-SBC

**PETITIONER'S REPLY TO**  
**RESPONDENTS' RESPONSE**

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18 **PETITIONER'S REPLY TO RESPONDENT'S RESPONSE**

19 Petitioner, by and through counsel, respectfully submits this Reply.

20 Petitioner maintains the arguments set forth in his original Petition and  
21 incorporates them herein by reference. In their Response, Respondents concede that  
22 Petitioner is being held under a theory of "mandatory detention" pursuant to 8 U.S.C.  
23 § 1225.  
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1 As this Court and an overwhelming majority of federal courts have  
2 repeatedly rejected this interpretation for noncitizens apprehended and released in  
3 the interior, Respondents have failed to provide a lawful basis for Petitioner's  
4 ongoing confinement. Importnatly, Respondent has been detained more than eight  
5 months.  
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8 Because the record is complete, the matter is ripe. Petitioner respectfully  
9 requests his immediate release.

10 Respectfully submitted.

11  
12 Dated: April 10 , 2026

13 /s/ Sarah L. Vuong  
14 Sarah L. Vuong  
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16 CA Bar No. 258528  
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20  
21 *Attorney for Petitioner*

22 **CERTIFICATE OF SERVICE**

23 I hereby certify that on April 10, 2026, I electronically filed the foregoing with  
24 the Clerk of the Court for the Eastern District of California using the CM/ECF  
25 system, which will send notification of such filing to opposing counsel of record.

26 Dated: April 10, 2026

27 /s/Sarah L. Vuong  
28 Sarah L. Vuong