

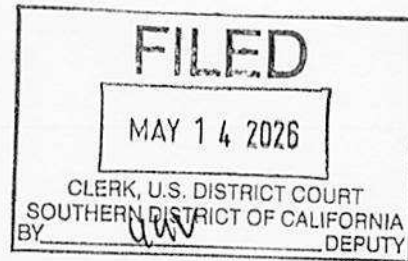
1 Dogukan Sahin

2 Alien No. [REDACTED]

3 Otay Mesa Detention Center

4 7488 Calzada de la Fuente

5 San Diego, CA 92154



7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
9

10 DOGUKAN SAHIN,

11 -Petitioner, *Pro Se*,

12 v.

13 Kristi NOEM, in her Official Capacity,
14 Secretary of the Department of Homeland Security,¹

15 Pamela J. BONDI, in her Official Capacity,
16 Attorney General, Department of Justice,

17 Patrick DIVVER, in his Official Capacity,
18 Field Office Director, San Diego Field Office,
19 U.S. Immigration and Customs Enforcement,
20 Enforcement and Removal Operations,

21 Todd LYONS, in his Official Capacity,
22 Acting Director, Immigration & Customs Enforcement,

23 Christopher J. LAROSE, in his Official Capacity,
24 Warden of Immigration Detention Facility,
25 Otay Mesa Detention Center;

26 -Respondents.
27
28
29
30
31
32
33
34

) No.: 3:26-cv-02336-DMS-GC

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

INS.: [REDACTED]

) Custody Status: DETAINED

) **Petitioner's Reply to**
) **Respondents' Return**

¹ Although Former Secretary Noem has ceased to hold office, the Court will wait to order substitution until her successor has been appointed. *See* FED. R. CIV. P. 25(d) ("An action does not abate when a public officer who is a party in an official capacity . . . resigns[] or otherwise ceases to hold office while the action is pending. The officer's successor is automatically substituted as a party. Later proceedings should be in the substituted party's name . . . The court may order substitution at any time . . .").

PETITIONER'S REPLY TO RESPONDENTS' RETURN

COMES NOW DOGUKAN SAHIN, as the Petitioner in this present matter, appearing *Pro Se*, and hereby respectfully submits this Reply to Respondents' Return.

Petitioner Dogukan Sahin is an immigration detainee proceeding with a petition for writ of habeas corpus. (Doc. 1.) On April 20, 2026, the Court ordered Respondents to show cause why the Petition should not be granted.

It is important to point out that there are *no* factual or legal issues in this case that distinguish it from other prior orders from federal Courts in California having the same or similar circumstances in *Elmer Joel M. C. v. Wofford*, No. 1:25-CV-01622-KES-CDB (HC), 2025 WL 3501200 (E.D. Cal. Dec. 6, 2025); *Clene C.D. v. Robbins*, No. 1:25-CV-01463-KES-SKO (HC), 2026 WL 84302 (E.D. Cal. Jan. 12, 2026); *Bilal A. v. Wofford*, No. 1:25-CV-01715-KES-HBK (HC), 2025 WL 3648366 (E.D. Cal. Dec. 16, 2025); *W.V.S.M. v. Wofford*, No. 1:25-CV-01489-KES-HBK (HC), 2025 WL 3236521 (E.D. Cal. Nov. 19, 2025), that would justify denying the petition.

Yet, Respondents did not show cause as to whether there are any factual or legal issues in this case that render it distinguishable from the prior orders in *Elmer Joel M. C. v. Wofford*, *Clene C.D. v. Robbins*, *Bilal A. v. Wofford*, and *W.V.S.M. v. Wofford* and that would justify denying the petition, or indicate the matter is substantively distinguishable.

On April 27, 2026, Respondents filed a response. Respondents do not indicate that the petition presents any significant factual or legal issues that materially distinguish it from the cases identified in prior orders. However, Respondents acknowledge that this case is not distinguishable from prior decisions made by this Court. Essentially, Respondents do not oppose to immediate release. Therefore, this Court should grant immediate release and close this case.

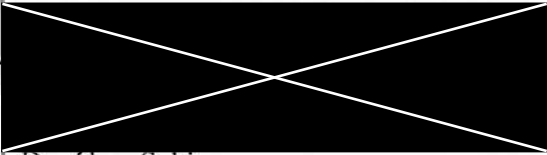
1 Again, Respondents have not made any new legal arguments and have not identified any
 2 factual or legal issues in this case that would distinguish it from the Court's prior decisions
 3 noted below. Thus, this Court should grant the petition for writ of habeas corpus for the reasons
 4 addressed in those prior orders and order Petitioner's immediate release because this case is not
 5 distinguishable from other prior orders in *Elmer Joel M. C. v. Wofford*, *Clene C.D. v. Robbins*,
 6 *Bilal A. v. Wofford*, and *W.V.S.M. v. Wofford* and because Respondents failed to justify denying
 7 the petition, and failed to indicate the matter is substantively distinguishable. As such, this Court
 8 should grant this petition and order Respondents to release Petitioner immediately.

9 Although Respondents filed a Return, in their Return filed with this Court on April 27,
 10 2026 (ECF 6), Federal Respondents acknowledge that this present case is not materially
 11 distinguishable from prior decisions made by this Court. Respondents further acknowledge
 12 that prior decisions should control the result here. *See, e.g., Arias Torres v. Bondi*, No. 25-cv-
 13 2457-BAS-MSB, 2025 WL 3214773 (S.D. Cal. Nov. 18, 2025); *Martinez Lopez v. LaRose*,
 14 No. 25-cv-2717-JES-AHG, 2025 WL 3030457 (S.D. Cal. Oct. 30, 2025); *Beltran v. Noem*, No.
 15 25cv2650-LL-DEB, 2025 WL 3078837 (S.D. Cal. Nov. 4, 2025); *Garcia v. Noem*, 803 F.
 16 Supp. 3d 1064 (S.D. Cal. 2025); *Esquivel-Ipina v. LaRose*, No. 25-CV-2672 JLS (BLM), 2025
 17 WL 2998361 (S.D. Cal. Oct. 24, 2025); *Lucas-Miguel v. LaRose*, No. 25-cv-3022-RSH-JLB,
 18 2025 WL 3251580 (S.D. Cal. Nov. 21, 2025); *Vasquez-Diaz v. LaRose*, No. 25-cv-3038-TWR-
 19 JLB, ECF No. 6 (S.D. Cal. Nov. 13, 2025); *Cardoso v. LaRose*, No. 25-cv-3043-BJC-VET,
 20 ECF No. 7 (S.D. Cal. Dec. 12, 2025); *Maceda-Garcia v. Noem*, No. 25-cv-2968-JO-JLB, ECF
 21 No. 9 (S.D. Cal. Nov. 13, 2025); *A.S. v. LaRose*, No. 25-cv-2876-RBM-VET, ECF No. 9 (S.D.
 22 Cal. Nov. 19, 2025); *Prieto-Cordova v. LaRose*, No. 25-cv-2824-CAB-DDL, 2025 WL
 23 3228953 (S.D. Cal. Nov. 19, 2025); *Lagarda-Vega v. Noem*, No. 25-cv-2970-GPC-DDL, 2025
 24 WL 3558931 (S.D. Cal. Dec. 11, 2025); *Nayyer v. LaRose*, No. 25-cv-3111-AGS-DDL, ECF

1 No. 7 (S.D. Cal. Dec. 12, 2025); *Amaya v. Noem*, No. 25cv2892-BTM-DEB, 2025 WL
2 3182998 (S.D. Cal. Nov. 13, 2025).

3 Essentially, in this case, Respondents do not oppose the petition and defers to this Court
4 on the appropriate relief. As such, this Court should grant this petition and order Respondents
5 to immediately release Petitioner, Dogukan Sahin.

6
7
8 Respectfully submitted on this 12th day of May, 2026.
9

10 
11
12 Dogukan Sahin

13 Alien No. 

14 Otay Mesa Detention Center

15 7488 Calzada de la Fuente

16 San Diego, CA 92154
17
18
19
20
21
22
23
24
25

1 / / /

2 / / /

3 / / /

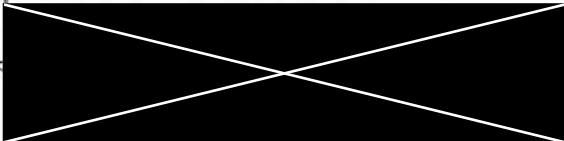
4 / / /

5 / / /

6 **ACKNOWLEDGEMENT AND VERIFICATION**

7 Under penalty of perjury, the undersigned declares that he is the named Petitioner in the
8 foregoing petition. I have read the foregoing petition and its contents. The statements in the
9 petition are true and correct to the best of my knowledge, except as to any statements alleged
10 on information and belief, and as to those statements, I believe them to be true.

11
12 DATED this 12th day of May, 2026.

13
14 
15
16 -Petitioner, *Pro Se*

17 Dogukan Sahin

18 Alien No. 

19 Otay Mesa Detention Center

20 7488 Calzada de la Fuente

21 San Diego, CA 92154
22
23
24

CERTIFICATE OF SERVICE

I, Dogukan Sahin, hereby certify that on the date indicated below I served the Clerk of the Court for the United States District Court for the Southern District of California and Respondents a true and complete copy of the foregoing documents by placing it in a pre-paid envelope and mailing it to the following address:

**Clerk, U.S. District Court for the
Southern District of California**
333 West Broadway, Suite 420
San Diego, CA 92101

Kristi Noem
Secretary of the Department of
Homeland Security
2707 Martin Luther King Jr. Ave SE,
Washington, DC 20528

Pamela J. Bondi
Attorney General of the United States
950 Pennsylvania Avenue, NW,
Washington, DC 20530-0001

Christopher J. LaRose
Warden, Immigration Facility
Otay Mesa Detention Center
7488 Calzada de la Fuente
San Diego, CA 92154

Patrick Divver
Acting Field Office Director
San Diego Field Office
720 East San Ysidro Blvd.
San Diego, CA 92173

Todd M. Lyons
Acting Director, ICE Deputy Director
500 12th St. SW
Washington, DC 20536

Respectfully submitted and executed on this 12th day of May, 2026.


Dogukan Sahin
Alien No. 
Otay Mesa Detention Center
7488 Calzada de la Fuente
San Diego, CA 92154

PETITIONER'S REPLY TO RESPONDENTS' RETURN

DOGUKAN SAHIN
ALIEN No. 
PETITIONER, PRO SE
CUSTODY STATUS: DETAINED