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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

HAOXU YIN,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of the Department of Homeland Security, TODD BLANCE, Acting Attorney General, TODD M. LYONS, Acting Director, Immigration and Customs Enforcement, JESUS ROCHA, Acting Field Office Director, San Diego Field Office, CHRISTOPHER LAROSE, Warden at Otay Mesa Detention Center,

Respondents.

Civil Case No.: 26-cv-2668-GPC-GC

Reply to Respondents' Supplement

Mr. Yin, by and through counsel, agrees with Respondents that this Court should stay the proceedings and order Respondents to provide a status report as to his removal to China no later than June 29, 2026. ECF No. 7 at 3.

Because Respondents have not yet received a travel document for Mr. Yin, even though they have scheduled a flight for him on the belief they will receive the document from China beforehand, denial of the petition is not appropriate at

this time. It has now been more than six months since his removal order became final. The government has still not received a travel document. Indeed, the following relevant dates indicate how challenging it has been for the government to effectuate Mr. Yin's removal:

- Detained: January 26, 2025
- Credible fear interview: May 15, 2025
- Order of removal issued: November 4, 2025
- Order of removal final: December 5, 2025
- Request to ICE's RIO: February 18, 2026
- Travel document receipt: TBD
- Scheduled flight: On or before June 26, 2026

Dkt. 7-1, ¶¶ 4–12.

This Court should thus order Respondents to provide a status report as to Mr. Yin's removal to China no later than June 29, 2026.

Respectfully submitted,

Dated: June 12, 2026

s/ Jessie Agatstein

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