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7 Attorneys for Respondents

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

10 MAKHARE JANGAVADZE,  
11 **Petitioner,**

12 v.

13 JEREMY CASEY, *Warden, Imperial*  
14 *Regional Detention Facility,*

15 **Respondent.**

Case No. 26-cv-02619-JLS-GC

**JOINT MOTION TO VACATE  
ORDER TO SHOW CAUSE**

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18 On April 24, 2026, Petitioner filed a petition for writ of habeas corpus pursuant  
19 to 28 U.S.C. § 2241 in which he challenges his detention by Immigration and Customs  
20 Enforcement (ICE). ECF No. 1. On April 29, 2026, the Court issued an order that set  
21 certain filing deadlines and, in pertinent part, enjoined Respondents from removing  
22 Petitioner from the United States or this District. ECF No. 3. Respondents' counsel and  
23 Petitioner's counsel have conferred on Petitioner's desire to be removed from the  
24 United States and Respondents' believe they can effectuate Petitioner's removal in the  
25 next 14 days.

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1 Based on the foregoing, the parties request that the Court issue an order:  
2 (1) vacating paragraph 3 of its April 29, 2026, Order, ECF No. 3, and (2) confirming  
3 that Respondents are *not* precluded from removing Petitioner from the United States  
4 during the pendency of this habeas action.

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6 Dated: May 20, 2026

Respectfully submitted,

7 *s/ Gary P. Burcham*

8 GARY P. BURCHAM  
9 Attorney for Petitioner

10 Dated: May 20, 2026

Respectfully submitted,

11 ADAM GORDON  
12 United States Attorney

13 *s/Danielle L. Brown*

14 DANIELLE L. BROWN  
15 Assistant United States Attorney

16 Attorneys for Respondents

17 **SIGNATURE CERTIFICATION**

18 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies  
19 and Procedures of the United States District Court for the Southern District of  
20 California, I hereby certify that the content of this document is acceptable to Gary P.  
21 Burcham, counsel for Petitioner, and that I have obtained Mr. Burcham's authorization  
22 to affix his electronic signature to this document.  
23

24 Dated: May 20, 2026

*s/Danielle L. Brown*

25 DANIELLE L. BROWN  
26 Assistant United States Attorney  
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