

1 ADAM GORDON
United States Attorney
2 CAMILLE SAVEDRA
California Bar No. 336490
3 Assistant U.S. Attorney
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-5084
Email: camille.savedra@usdoj.gov

6 Attorneys for Respondents

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

10 ARASH EIDI,

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12 Petitioner,

13 v.

14 JEREMY CASEY, Warden; *et al.*,

15 Respondents.
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Case No.: 26-cv-02662-BTM-DDL

**RESPONSE TO AMENDED
PETITION**

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).

23 Respondents therefore acknowledge that Petitioner is entitled to be released from
24 custody subject to conditions of supervision. *See* 8 U.S.C. § 1231(a)(3); 8 C.F.R.
25 § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-BJW, 2026 WL 218936, at *1 (S.D.
26 Cal. Jan. 27, 2026) (“The habeas statute does not empower courts to manage ICE
27 supervision programs.”) (citing 28 U.S.C. § 2241(c)(3)); *Khachikian v. Casey*, No. 25-
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1 cv-3737-GPC-JLB, ECF No. 13 (S.D. Cal. Jan. 13, 2026) (“Ultimately, ICE has
2 discretion to impose conditions on release.”).

3 DATED: May 15, 2026

ADAM GORDON
United States Attorney

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5 s/ Camille Savedra
6 CAMILLE SAVEDRA
Assistant United States Attorney
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