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6 Attorneys for Petitioner,
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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
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11
12 KAREN GHAZARYAN,
13 Petitioner,

14 v.
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16 CHRISTOPHER J. LAROSE, in his
17 official capacity as Warden, Otay Mesa
Detention Center;

18 TAE D. JOHNSON,
19 Acting Director, U.S. Immigration and
20 Customs Enforcement;

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22 KRISTI NOEM, Secretary, U.S.
Department of Homeland Security;

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24 PAMELA JO BONDI, Attorney
General of the United States,
25

26 Respondents.
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Case No. 26-cv-03048-RBM-JLB

PETITIONER'S REPLY TO
RESPONDENTS' RESPONSE TO
PETITIONER'S PETITION

1 Petitioner Karen Ghazaryan, by and through undersigned counsel, respectfully
2 submits this Reply to Respondents' Response.

3 At the outset, Respondents effectively concede the central issue in this case.
4 While maintaining their legal position, Respondents acknowledge that courts within
5 this District have consistently rejected the government's theory of detention and
6 further state that they do not oppose the petition and defer to this Court regarding the
7 appropriate relief. This concession is significant and supports granting the relief
8 requested without delay.

9 As detailed in the Petition, Petitioner was re-detained without notice, without a
10 warrant, and without any opportunity to be heard—conduct that constitutes a clear
11 violation of procedural due process. ICE's actions deprived Petitioner of liberty in the
12 most arbitrary manner, with no pre-deprivation safeguards whatsoever.

13 The harm to Petitioner is not theoretical—it is immediate and severe. Petitioner
14 suffers from ongoing medical conditions that require attention and care, which
15 detention has only exacerbated. His continued confinement places his health at serious
16 risk and constitutes irreparable injury that cannot be remedied after the fact. Courts
17 have consistently recognized that unlawful detention itself, particularly where
18 compounded by medical vulnerability, constitutes irreparable harm warranting
19 immediate relief.

20 Further, Petitioner has no criminal history whatsoever, a fact explicitly
21 reflected in the record. He has lived in the United States in full compliance with all
22 immigration requirements and posed no danger to the community. At the time of his
23 arrest, Petitioner was gainfully employed and supporting his family. He was
24 apprehended during the course of his normal daily life—without warning and without
25 any justification.

26 Petitioner is also the sole breadwinner for his household. His detention has left
27 his family without financial support, creating immediate economic hardship.
28 Compounding this harm, Petitioner's young child suffers from a medical condition

1 and depends on Petitioner for care and stability. The impact of Petitioner’s detention
2 therefore extends beyond him and imposes significant hardship on an already
3 vulnerable family.

4 Given these circumstances, continued detention serves no legitimate purpose.
5 Even Respondents do not defend the necessity of Petitioner’s detention in this case
6 and instead defer to the Court on the appropriate remedy.

7 To the extent the Court considers ordering a bond hearing rather than
8 immediate release, such relief would still fail to cure the constitutional violation. In
9 practice, bond in these cases is set at no less than \$3,000—despite a statutory
10 minimum of \$1,500—and often higher. Requiring Petitioner to pay a substantial bond
11 after being unlawfully detained, and after already incurring significant attorney’s fees
12 and costs, would impose an additional and unjust financial burden. It would
13 effectively condition restoration of Petitioner’s liberty on his ability to pay, despite
14 the government’s failure to afford him due process in the first instance.

15 Under these facts, the balance of equities and the interests of justice weigh
16 decisively in favor of immediate release. Petitioner poses no danger, no flight risk,
17 and has strong community and family ties. His detention is constitutionally defective,
18 causes ongoing irreparable harm, and is not meaningfully defended by Respondents.

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1 For the foregoing reasons, and in light of Respondents' concession and non-
2 opposition, Petitioner respectfully requests that this Court:

- 3 1. Grant the Petition for Writ of Habeas Corpus;
4 2. Order Petitioner's immediate release without bond; and
5 3. Grant such other relief as the Court deems just and proper.

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8 Dated: May 22, 2026

EMPERADOR LAW FIRM, P.C.

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By: /s/ Armine Antonyan
Armine Antonyan, Esq.
Attorney for Petitioner