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11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13

14 GURDIP SINGH,
15 Petitioner,
16 v.
17 JAMES CHIANG, et al.,
18 Respondents.

Case No. 5:25-cv-03024-FMO-SP

**NOTICE OF COMPLIANCE AND
OPPOSITION TO APPLICATION FOR
PRELIMINARY INJUNCTION;
SUGGESTION OF MOOTNESS**

RESPONDENTS' NOTICE OF COMPLIANCE AND OPPOSITION TO
APPLICATION FOR PRELIMINARY INJUNCTION; SUGGESTION OF
MOOTNESS

Petitioner filed his Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 requesting immediate release from immigration detention at the Adelanto Immigration Processing Center [Dkt. 1]. On December 15, 2025, the Court issued an order [Dkt. 16] providing that Respondents were enjoined from continuing to detain Petitioner and further directing Respondents to release Petitioner “forthwith.” Dkt. 16 at 8. The Court’s order further required Respondents to file a Notice of Compliance stating that they had released the Petitioner. Respondents hereby provide such notice of the Petitioner’s release.

The Petitioner was in fact already released from ICE custody on December 11, 2025, prior to the issuance of the Court’s order on December 15, 2025. Petitioner was released by ICE, without a bond hearing before an Immigration Judge. As explained in Respondents’ prior papers, the Respondents had already been arranging for a custody redetermination for the Petitioner, and they anticipated that this matter would be mooted by such a custody redetermination.

The Court’s order also construed the Petitioner’s Application as an application for a preliminary injunction (the “PI Application”), and ordered the Respondents to file an opposition by December 18, 2025. Respondents hereby oppose the PI Application on the grounds that the release of the Petitioner from ICE custody moots the requested preliminary injunction and this habeas petition more generally. *See, e.g., Munoz v. Rowland*, 104 F.3d 1096, 1097–98 (9th Cir. 1997) (“Because [the petitioner] has been released ..., we can no longer provide him the primary relief sought in his habeas corpus petition.”). As the Supreme Court has explained, once a challenged restraint has ceased to have any continuing effect, “mootness . . . simply deprives us of our power to act; there is nothing for us to remedy, even if we were disposed to do so.” *Spencer v. Kemna*, 523 U.S. 1, 18 (1998). The Ninth Circuit has been clear about the scope of habeas relief, explaining that “release from confinement is the only available remedy for claims at the writ’s core .

1 . . .” *Pinson v. Carvajal*, 69 F.4th 1059, 1070 (9th Cir. 2023), *cert. denied sub nom. Sands*
2 *v. Bradley*, 144 S. Ct. 1382 (2024); *see also id.* at 1076 (“Because [petitioner’s] claims lie
3 outside the historic core of habeas corpus, we conclude the district court properly found it
4 lacked jurisdiction to hear [his] petition.”); *see also Preiser v. Rodriguez*, 411 U.S. 475,
5 484 (1973) (“It is clear . . . from the common-law history of the writ . . . that the essence
6 of habeas corpus is an attack by a person in custody upon the legality of that custody, and
7 that the traditional function of the writ is to secure release from illegal custody.”).

8 Accordingly, Respondent respectfully requests that the Court deny the PI
9 Application and dismiss the action.

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11 Dated: December 16, 2025

Respectfully submitted,

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