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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

Garo Vartanyan, Petitioner, v. Kristi Noem, Secretary of the Department of Homeland Security; et. al, Respondents.	Case No.: Case 5:25-cv-03205-JFW-BFM **NOTICE OF MOTION AND MOTION TO DEEM RESPONDENTS' OPPOSITION WAIVED AND TO DECIDE PETITIONER'S APPLICATION AS UNOPPOSED** Filed Under Federal Rule of Civil Procedure 16(f) and Local Rule 7-12

NOTICE OF MOTION AND MOTION TO DEEM RESPONDENTS' OPPOSITION WAIVED AND TO DECIDE PETITIONER'S APPLICATION AS UNOPPOSED

PLEASE TAKE NOTICE that Petitioner will and hereby does move this Court for an order deeming Respondents' opposition waived and deciding Petitioner's Application as unopposed, or in the alternative, striking any untimely opposition.

This motion is made pursuant to Federal Rule of Civil Procedure 16(f) and Local Rule 7-12, based on Respondents' failure to comply with the Court's

December 16, 2025 Order requiring the filing of an opposition by December 18, 2025, at 4:00 p.m. This motion is based on this Notice, the accompanying Memorandum of Points and Authorities, the pleadings and records on file, and any argument the Court may permit.

Date: 12/18/25

Respectfully submitted,

/s/ Andres Ortiz
Andres Ortiz, Esq.
Andres Ortiz Law
Attorney for the Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *Notice of Motion and Motion to Deem Respondents' Opposition Waived and to Decide Petitioner's Application as Unopposed* in *Garo Vartanyan v. Noem et. al*, with the Clerk of the Court for the Central District of California by using the CM/ECF December 16, 2025, for filing and transmittal of Notice of Electronic Filing

/s/ Andres Ortiz
Andres Ortiz, Esq.
Attorney for Petitioner