Sabrina Damast (CA SBN #305710 and NY SBN #5005251)
Amy Lenhert (CA Bar #227717)
Rocio La Rosa (CA Bar #314831)
Law Office of Sabrina Damast, Inc.
510 West 6th Street, Suite 330
Los Angeles, CA 90014
Telephone: (323) 475-8716
Emails: sabrina@sabrinadamast.com
amy@sabrinadamast.com
rocio@sabrinadamast.com

Counsel for Petitioner
Tigran Tiraturian

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

Tigran Tiraturian,

Petitioner,

v.

PAMELA BONDI, in her official capacity as Attorney General,

KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security,

U.S. DEPARTMENT OF HOMELAND SECURITY,

F. SEMAIA, in his official capacity as Warden of Adelanto Detention Facility,

JAIME RIOS, in his official capacity as ICE Field Office Director,

Respondents.

Case No. 5:25-cv-03239-WLH-DFM

TRAVERSE IN SUPPORT OF PETITIONER'S PETITION FOR A WRIT OF HABEAS CORPUS

IMMIGRATION HABEAS CASE

I. Introduction

Tigran Tiraturian (Petitioner) filed a habeas petition challenging his detention and a motion for a temporary restraining order (TRO) seeking immediate release. On December 8, 2025, the Court granted the motion for a TRO. Dkt. 6. Specifically, the Court ordered Petitioner's immediate release and enjoined Respondents from again revoking his release without providing the due process necessary for the revocation of an Order of Supervision (OSUP). *Id.* On December 19, 2025, the Court also issued a preliminary injunction (PI) that preserved these pre-requisites for re-detention. Dkt. 10.

On January 6, 2026, Respondents filed their response to the habeas petition. Dkt. 13. In the response, Respondents referenced their arguments in opposition to the TRO, while simultaneously asserting that "Petitioner has already obtained the complete relief sough in his Petition over which this Court has jurisdiction." Dkt. 13, p. 1. Specifically, Respondents argued that because the Court had already released Petitioner, there is no further relief for it to provide. *Id.* Respondents maintain that any possibility of re-detention is speculative, and therefore, not remediable by this Court. *Id.* at p. 2.

II. Argument

A. The Petition is not Moot

Respondents assert that the habeas petition is now moot because Petitioner has been released. "A case becomes moot . . . when the issues presented are no longer live or the parties lack a legally cognizable interest in the outcome." *Phu Van Ta v. Kristi Noem et al.*, 2025 WL 3764001, *2 (C.D. Ca. Dec. 22, 2025) (unpub) (citing *Rosebrock v. Mathis*, 745 F.3d 963, 971 (9th Cir. 2014). In *Phu Van Ta*, the petitioner had also been ordered released pursuant to a TRO due to the government's failure to comply with the regulations in 8 C.F.R. §§ 241.4 and 241.13. *Phu Van Ta*, 2025 WL 3764001 at *4. The court found that the habeas petition was not moot because the government maintained that it had fully complied with the law when it had initially revoked the petitioner's release and thus had not provided any assurance that the wrongful revocation would not be repeated, absent court intervention. *Id.* at *3. "Accordingly, for this petitioner, the potential for redetention is great, and the stringent standard for mootness due to voluntary cessation has not been met." *Id.*

Petitioner's circumstances are identical to those of Phu Van Ta. He was released pursuant to a TRO finding that Respondents did not comply with the revocation requirements in 8 C.F.R. § 241.4 and 8 C.F.R. § 241.13. Despite that decision (which was reaffirmed in the Court's PI decision), Respondents maintain

that the revocation was proper. Thus, they have not met the high standard for mootness based on voluntary cessation, and Petitioner continues to have an interest in a permanent court order barring his re-detention without compliance with the regulations. *See also Min v. Santacruz*, 2025 WL 3764071, *3 (C.D. Ca. Dec. 23, 2025) (unpub) (collecting cases that conclude that release pursuant to a TRO does not moot a habeas petition); *see also Jazrawi v. Wolf*, 2021 L 978775, *1-*2 (S.D. Ca. Mar. 16, 2021) (unpub) (citing *Rodriguez v. Hayes*, 591 1105, 1117-18 (9th Cir. 2010) for the proposition that release from immigration custody does not necessarily moot a habeas petition if immigration authorities retain the authority to re-detain the petitioner and noting that a "request for prospective relief preventing Respondents from detaining him unlawfully cannot be mooted by his present release on an order of supervision").

III. Conclusion

For the foregoing reasons, Petitioner respectfully asserts that his petition for a writ of habeas corpus is not moot. He further requests the Court issue a permanent order enjoining Respondents from re-detaining him unless they follow the governing procedures for revocation of his release, including proving that changed circumstances exist to justify revocation of his release.

RESPECTFULLY SUBMITTED this 10th day of January, 2026.

/s/ Sabrina Damast
Sabrina Damast, CA Bar # 305710, NY Bar # 5005251
Amy Lenhert, CA SBN #227717
Rocio La Rosa, CA SBN#314831
Law Office of Sabrina Damast, Inc.
510 West 6th Street, Suite 330
Los Angeles, CA 90014
(O) (323) 475-8716
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amy@sabrinadamast.com
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