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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

MERI PETROSYAN,

Petitioner,

v.

PAM BONDI, *et al.*,

Respondents.

No. 5:25-cv-03240-CV-AS

RESPONDENTS' RESPONSE TO ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION

Honorable Cynthia Valenzuela
United States District Judge

RESPONDENTS' RESPONSE TO OSC RE: PRELIMINARY INJUNCTION

On December 12, 2025, the Court issued an order [Dkt. 8] providing that the Respondents were enjoined from continuing to detain Petitioner and further directing Respondents to release Petitioner "forthwith." Dkt. 8 at 1. The Court's order further required Respondents to show cause as to why a preliminary injunction should not issue. Respondents hereby show such cause.

Pursuant to the Court's order, Petitioner was released from the custody of U.S. Immigration and Custom's Enforcement ("ICE") on December 13, 2025. Accordingly, this 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.").

While Respondents continue to oppose the issuance of a preliminary injunction pursuant to the legal positions stated in the Respondents' brief in opposition to the Petitioners' *ex parte* application for a temporary restraining order [Dkt. 6], and the Respondents maintain that those positions warrant denying a preliminary injunction on the merits, the issue is mooted in any event by the TRO's issuance [Dkt. 8] and the subsequent release of Petitioner from ICE custody.

Accordingly, the OSC re: preliminary injunction should be discharged, and Petitioner should either voluntarily dismiss her Petition or else be required to respond to an OSC re: Dismissal.

Dated: December 17, 2025

Respectfully submitted,

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