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UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

MERI PETROSYAN,
Alien # [redacted],

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,

ERNESTO SANTACRUZ, JR., in his official capacity as Acting ICE Field Office Director,

Respondents.

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

PETITIONER'S RESPONSE TO ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION

Honorable Cynthia Valenzuela
United States District Judge

On December 2, 2025, Meri Petrosyan (Petitioner), filed a petition for a writ of habeas corpus challenging her unlawful detention, seeking release and an order preventing her re-detention without notice and a pre-deprivation hearing. Dkt. 1. She filed a motion for a temporary restraining order (TRO) that same day. Dkt. 3.

On December 12, 2025, the Court granted Petitioner's motion for a temporary restraining order and Petitioner was released from ICE custody. Dkt. 8. The Court ordered the Respondent and Petitioner to file responses as to why a preliminary injunction should not issue. Dkt. 8, at 14.

In their response, Respondents suggest that this matter is moot, given Petitioner's release from custody on December 13, 2025. Dkt. 9, at 2. To determine if a case is moot, a court must decide whether there is a present controversy as to which effective relief can be granted. *See Nw. Envtl. Def. Ctr. V. Gordon*, 849 F.2d 1241, 1244 (9th Cir. 1988). A case only becomes moot if the court is deprived of the ability to redress a party's injuries. *United States v. Alder Creek Water Co.*, 823 F.2d 343, 345 (9th Cir. 1987).

This case is not moot because this Court still has authority to provide redress to Petitioner's injuries. Petitioner does not dispute that she has been released from ICE custody. However, release was only part the of the relief sought in the habeas petition and ordered in the temporary restraining order (TRO). Petitioner also

sought, and this Court granted in its TRO, an order barring Respondents from re-detaining her without providing notice and a pre-deprivation hearing. Dkt. 8, at 14.

Thus, this case should not be dismissed until this Court issues a permanent injunction barring re-detention of Petitioner without the prescribed notice and pre-deprivation hearing.

RESPECTFULLY SUBMITTED this 19th day of December, 2025

/s/ Amy Lenhert
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