

Declaration of Ramanujan Nadadur

1
2
3 1. I am counsel to Mr. Marzban Mody in the above-captioned matter, and I
4 am admitted to practice before this Court.

5 2. On January 5, 2026, DHS issued a release order to Mr. Mody, requiring
6 that he report to an ICE officer on January 14, 2026. This release order also contains
7 other requirements. A true and correct copy of this order is attached to this declaration
8 as Exhibit A.

9 3. On January 7, 2026, I wrote an email to AUSA Mallory Lynn regarding
10 the government's Opposition brief and the DHS release order. I stated as follows:
11 "Would the government stipulate to not re-arresting my client absent a hearing or
12 notice, as the court said in its order? My client also has property still in the possession
13 of DHS, including his passport and the originals of his I-94s. If he can have his
14 property returned forthwith, then I think we can agree with your position regarding
15 dismissal."

16 4. On January 7, 2026, AUSA Mallory Lynn responded to my email as
17 follows: "Thanks for reaching out. We'll discuss and get back to you."

18 5. As of the date of this filing, the government has not responded to me
19 regarding its position on re-arrest. Additionally, the government has not informed me
20 how it intends to return my client's property.

21
22 I declare under penalty of perjury under the laws of the United States of America
23 that the foregoing is true and correct.

24 Executed on January 9, 2026, at Los Angeles, California.

25
26 /s/ Ramanujan Nadadur
27 Ramanujan Nadadur
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE

File No.:

Name: MODY, MARZBAN KEKI

Date: Jan 05, 2026

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

- ☒ You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.
- ☒ You must surrender for removal from the United States if so ordered.
- ☒ You must report in (person) to Duty officer at as See I-831 on 01/14/2026 07:00 AM directed.

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

- ☒ You must not change your place of residence without first securing written permission from the officer listed above.
- ☒ You must not violate any local, State or Federal laws or ordinances.
- ☒ You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- ☐ Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the U.S. Department of Homeland Security. As part of the ATD program, you will be subject to electronic monitoring and may be subject to a curfew. Failure to comply with the requirements of the ATD program will result in a redetermination of your release conditions or your arrest and detention.*
If fitted with a U.S. Immigration and Customs Enforcement GPS tracking ankle bracelet, do not tamper with or remove the device. Under federal law, it is a crime to willfully damage or attempt to damage property of the United States. Damaging or attempting to damage the GPS tracking ankle bracelet or any of its associated equipment (including, but not limited to, the charging station, batteries, power cords, etc.) may result in your arrest, detention, and prosecution under 18 U.S.C. § 1361 and/or 18 U.S.C. § 641, each punishable by a fine, up to ten years imprisonment, or both.
- ☒ See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by Immigration and Customs Enforcement.

MONTE, G 6830
SDDO

(Name and Title of ICE Official)

Alien's Acknowledgement of Conditions of Release under an Order of Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the ENGLISH language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.

CERVANTES, H 10450

Deportation Officer

(Signature of ICE Official Serving Order)

01/05/2026

Date

(Signature of Alien)

I hereby cancel this order of release because:

- ☐ The alien failed to comply with the conditions of release.
- ☐ The alien was taken into custody for removal.

(Signature of ICE Official Cancelling Order)

Date

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

**ORDER OF RELEASE ON RECOGNIZANCE
(ADDENDUM)**

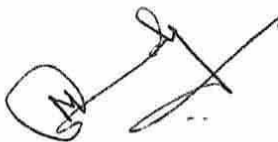
File No. 

Name: MODY, MARZBAN KEKI

Date: January 05, 2026

- ☒ That you do not associate with known gang members, criminal associates, or be associated with any such activity.
- ☐ That you register in a substance abuse program within 14 days and provide ICE with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a counselor.
- ☐ That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.
- ☐ That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide ICE with written proof of such within 10 days.
- ☒ That you do not commit any crimes while on this Order of Release on Recognizance.
- ☐ That you report to any parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- ☐ That you continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.
- ☒ That you provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.
- ☒ That you provide ICE with written responses from the Embassy or Consulate regarding your request.
- ☒ Any violation of the above conditions will result in revocation of your employment authorization document.
- ☒ Any violation of these conditions may result in you being taken into ICE custody and you being criminally prosecuted.
- ☐ Other:

X



(Signature of Alien)

U.S. Department of Homeland Security

Continuation Page for Form I-220A

Alien's Name MODY, MARZBAN KEKI	File Number 	Date Jan 05, 2026
LOCATION OF ICE OFFICE WHICH YOU REPORT TO ----- U.S. IMMIGRATION & CUSTOMS ENFORCEMENT ERO - SANTA ANA, CA SUB-OFFICE 34 CIVIC CENTER PLAZA, ROOM 1027 SANTA ANA CA 92701		
Signature CERVANTES, H 10450 	Title Deportation Officer	

5 of 5 Pages

Appointment Confirmed:

Wednesday, January 14, 2026 07:00AM (PST)

Confirmation #



Please keep this confirmation number for your records.

Selected Location:

SANTA ANA OFFICE HSI ASAC, ERO DFOD (SAA)

34 CIVIC CENTER PLAZA

SANTA ANA, CA 92701

📞 (714) 834-4881

Appointment Information:

👤 Name: **MODY, MARZBAN**

🛂 Alien Number



🛂 Subject ID:



🛂 Case ID:



📍 Appointment Type: **ATD - Office**

Site Directions:

ICE/ERO Office located in the Santa Ana Federal Building at 34 Civic Center Plaza, Room 1027, Santa Ana, CA 92701.

Site Instructions:

Aliens to report to the Santa Ana Federal Building at 34 Civic Center Plaza, Room 1027, Santa Ana, CA 92701, Monday through Friday from 8:00AM to 4:00PM. 1st Floor Front Desk: (714) 834-4881.