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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Muhammad Zeeshan,

Petitioner,

v.

Pamela Bondi, *et al.*,

Respondents.

Case No. 2:25-cv-02613-CDS-DJA

Federal Respondents' Non-Opposition to the First Amended Petition, ECF No. 9 and Motion for Temporary Restraining Order, ECF No. 10

Federal Respondents, through undersigned counsel, respectfully submit this statement of non-opposition to the First Amended Petition, ECF No. 9 and the motion for Temporary Restraining Order, ECF No. 10. This non-opposition is limited to the portion of the petition addressing whether there is a significant likelihood of removal in the reasonably foreseeable future ("SLRRFF"). *See e.g.*, ECF No. 9, at 11–13 (Grounds I, II).

Based on the posture of this case, the current record, and the documentary evidence presently available in this litigation, Federal Respondents do not oppose relief narrowly limited to the issue of Petitioner's SLRRFF. Opposition on that discrete issue would not materially advance resolution of the case on the existing record, and non-opposition avoids unnecessary litigation while preserving Federal Respondents' ability to address the remaining issues presented in the Petition, should relevant facts or circumstances materially change at a later time.

This non-opposition is limited in scope. Federal Respondents do not concede the legal validity of Petitioner's remaining arguments, and they do not waive any defenses or

arguments regarding any other aspect of the Petition. Federal Respondents expressly reserve all rights to oppose any broader relief and to litigate the issue of Petitioner's SLRRFF in a different posture, at a later date, and/or on a more developed record, should that opportunity arise.

Accordingly, Federal Respondents respectfully do not oppose relief limited to the issue of Petitioner's current SLRRFF and otherwise preserve all rights and arguments they may assert in response to the Petition. Federal Respondents recognize that this limited non-opposition resolves the Petition in its present posture and renders the Motion for Temporary Restraining Order moot.

Respectfully submitted this 10th day of February 2026.

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/s/ Martin J. Mayer
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