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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

Reply in Support of § 2241 Petition

Muhammad Zeeshan has been detained in immigration custody for more than six months. Respondents concede there is no significant likelihood of removal in the reasonably foreseeable future. ECF No. 11. Thus, while maintaining their objection to the remainder of the claims, Respondents do not oppose granting Mr. Zeeshan's petition on the basis that removal is not reasonably foreseeable. ECF No. 11. Because there is no legal authority for Mr. Zeeshan's continued detention, he respectfully requests this Court grant the petition, order his immediate release, and dismiss the motion for temporary restraining order as moot. *See Azimi Osmavandani v. Mattos, et al.*, 2:26-cv-00008-GMN-BNW, ECF No. 19 (D. Nev. Feb. 5, 2006).

Dated February 11, 2026.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Ellesse Henderson
Ellesse Henderosn
Assistant Federal Public Defender

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on February 11, 2026. I certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third-party commercial carrier for delivery within three calendar days, to the following person:

Muhammad Zeeshan A[redacted]
Nevada Southern Detention Center
2190 E. Mesquite Avenue
Pahrump, NV 89048

John Mattos
Warden
Nevada Southern Detention Center
2190 E. Mesquite Ave.,
Pahrump, NV 89060

I hereby certify that the foregoing has been filed on February 11, 2026. I personally served a true and correct copy of the foregoing **Reply in Support of § 2241 Petition** by CM/ECF to the following individuals:

Virginia Tomova
DOJ-USAO
501 Las Vegas Blvd., S.
Suite 1100
Las Vegas, NV 89101
virginia.tomova@usdoj.gov

/s/ Jeremy Kip
An Employee of the
Federal Public Defender