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7 Attorneys for Respondents

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10  
11 SUREN PINACHYAN,

12 Petitioner,

13 v.

14 WARDEN; et al.,

15 Respondents.

Case No.: 26-cv-1335-JO-JLB

**RESPONDENTS' SUPPLEMENT  
TO EX PARTE MOTION TO  
EXTEND TIME TO RELEASE**

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19 On March 27, 2026, the Court issued an order granting the habeas petition and  
20 ordering Respondents to “transport Petitioner back to San Diego—the district in which  
21 Petitioner filed his habeas petition—and to release him by 5 p.m. on March 29, 2026.”  
22 ECF No. 12. Upon receiving the Court’s order, counsel for Respondents conveyed the  
23 Court’s order to ICE counsel. ICE immediately began taking steps to comply with the  
24 Court’s order and to transport Petitioner from Pine Prairie, Louisiana—where Petitioner  
25 is currently detained—back to San Diego, California.

26 On March 27, 2026, Respondents filed a motion requesting that the Court extend  
27 the time for Respondents to release Petitioner in San Diego, given available flight  
28 schedules. Since that filing, Respondents have continued to work diligently to comply

1 with the Court's order (ECF No. 12) and currently anticipate releasing Petitioner in San  
2 Diego on the morning of March 30, 2026. Once Petitioner is released, Respondents will  
3 expeditiously file a declaration confirming his release. Accordingly, Respondents  
4 respectfully request that the Court extend the time for Respondents to release Petitioner  
5 in San Diego to March 30, 2026.

6  
7 DATED: March 28, 2026

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