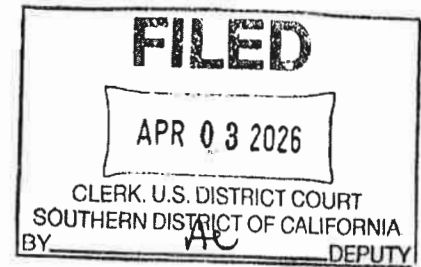


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Suren Pinachyan
Petitioner
v.
Warden.ET AL.
Respondents

Case No 3:26-cv-01335



Petitioner's Response Without Access to Respondents' Return.

Petitioner Suren Pinachyan respectfully submits this response.

Petitioner has not received a copy of Respondents' Return filed on March 25, 2026 (DKT.No 9) nor any of its attachments including the Declaration of Exhibits referenced therein.

Due multiple transfers between detention facilities beginning on March 4, 2026, Petitioner has been unable to receive legal mail including Court documents. Petitioner was transferred from San Diego, California to Florence, Arizona, then to Port Isabel, Texas, the Alexandria, Louisiana and later to Pine Prairie, Louisiana. During these transfers, Petitioner had no meaningful access to legal mail or law library resources.

The docket further reflects that Respondents filed a Certificate of Service (DKT.NO 9) stating that the Return was served on Petitioner.

However Petitioner never received the return or any related documents. Therefore, despite Respondents' certification, Petitioner did not have actual notice or access to the Government's filing and was unable to respond.

Petitioner has requested access to the DHS response through ICE officers and the law library but has received no response.

As a result Petitioner is unable to provide a full response to the Government's arguments. The lack of access has prevented Petitioner from meaningfully participating in these proceedings.

Petitioner maintains that his continued detention is unlawful.

Petitioner has been detained for a prolonged period, and there is no significant likelihood of removal in the reasonably foreseeable future.

Petitioner respectfully requests that the Court consider these circumstances and grant appropriate relief or alternatively allow Petitioner an opportunity to respond fully after receiving the Government's filing.

Petitioner reserves the right to supplement this response upon receiving the Return.

Respectfully submitted

Suren Pinachyan 



Pine Prairie ICE Processing Center
Petitioner PRO SE

Date 26 MARCH 2026

CERTIFICATE OF SERVICE

I, Suren Pinachyan, certify that a copy of this document was served by mail on the following:

Office of the United States attorney
southern district of California
880 front street, room 6293
San Diego, CA 92101

executed on 26 March, 2026

Suren Pinachyan *SP*



petitioner se