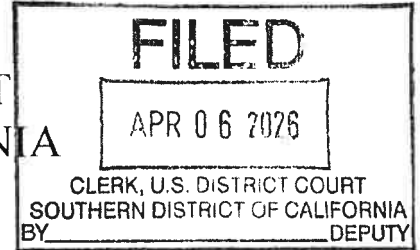


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



Suren Pinachyan
Petitioner
v.
Warden.ET AL.
Respondents

26-cv-1335-JO

PPETITIONER'S SUPPLEMENTAL RESPONSE TO RESPONDENTS' RETURN

Petitioner Suren Pinachyan respectfully submits this supplemental response to address factual inaccuracies and to clarify the timeline of events.

I. Petitioner received Respondents' return only on March,26,2026.

Petitioner did not receive Respondents' return until March,26,2026

On March,27,2026, Petitioner submitted a written response by mail.

Accordingly any legal in responding was due to lack of access to legal mail and not due to any failure on the part of Petitioner.

II.Respondent's factual assertion regarding Petitioner's location is incorrect.

Respondents state that Petitioner was transferred to pine Prairie ,Louisiana on March,5,2026.

This statement is incorrect.

On March,5,2026,Petitioner was in transit and not located at Pine Prairie.

The actual timeline is as follows:

*On March,4,2026:transfer from San Diego,California to La Pass,Texas, Then to Florence Arizona

*On March,5.2026:transfer from Florence Arizona to UTA(Ohio) then to Port Isabel,Texas

*March 6,2026:transfer from Port Isabel,Texas to Alexandria,Louisiana

*March 13,2026:transfer from Alexandria,Louisiana to Pine Prairie,Louisiana
Petitioner did not arrive at Pine Prairie until March 13,2026.

III. Continuous transfers prevented access to legal mail

During this period of transfers between multiple facilities Petitioner had no
sable access to

*legal mail

*law library

*Court correspondence

As a result, Petitioner did not receive Court documents in a timely manner.

IV. Jurisdiction is determined at the time of filing

Petitioner filing this habeas petition on March, 2, 2026, while detained within the
Southern District of California.

Under established law, jurisdiction attaches at the time of filing and is not defeated by
subsequent transfer.

Accordingly Respondents' argument regarding improper venue lacks merit.

V. Respondents' argument should be rejected

Respondents rely on an incorrect factual premise regarding petitioner's location and
ignore the established rule that post-filing transfers do not defeat jurisdiction.

Additionally, Respondents' own actions in transferring Petitioner multiple times
contributed to the disruption of legal communication.

VI. Conclusion

For the reasons stated above, Respondents' argument regarding dismissal or transfer this
case should be rejected.

Petitioner respectfully request that this Court retain jurisdiction and proceed to consider
the merits of the petition.

Suren Pinachyan 



Pine Prairie ICE Processing Center
Petitioner PRO SE

Date 24 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 27 March, 2026

Suren Pinachyan 

petitioner se