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8 Attorneys for Respondents

9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 MODOU SARR,

12 Petitioner,

13 v.

14 MARKWAYNE MULLIN, Secretary of the
Department of Homeland Security, *et al.*,

15 Respondents.

Case No. 26-cv-02206-CAB-JLB

RESPONDENTS'
SUPPLEMENTAL BRIEF

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19 Respondents submit this supplement brief to inform the Court that Respondents
20 completed another step towards effectuating Petitioner's removal to Gambia.¹ On June
21 1, 2026, Immigration and Customs Enforcement (ICE), Enforcement and Removal
22 Operations (ERO), obtained a travel document for Petitioner. *See* Declaration of Jose
23 A. Guardado ("Guardado Decl.") at ¶ 9. As such, ERO's next step is to schedule a flight
24 for Petitioner to be removed to Gambia, which is expected to occur later this month.
25 *See id.* at ¶ 10. For the foregoing reasons, in conjunction with the reasons submitted in
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28 ¹ Respondents respectfully note that the six month "presumptively reasonable"
detention to affect Petitioner's removal has not lapsed as of the date of this filing. *See*
Zadvydas v. Davis, 533 U.S. 678, 701 (2001).

1 Respondents' Opposition (*see* ECF No. 6), Respondents respectfully request that the
2 Court dismiss Petitioner's habeas petition.

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4 Dated: June 2, 2026

Respectfully submitted,

5 ADAM GORDON
6 United States Attorney

7 *s/ Camille Savedra*
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