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9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA
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12 SHARIF IBRAHIM,

13 Petitioner,

14 v.

15 MARKWAYNE MULLIN; et al.,

16 Respondents.
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Case No.: 26-cv-3023-DMS-MMP

RESPONSE TO PETITION

21 Respondents, by and through counsel, hereby respond to the Petition for Writ of
22 Habeas Corpus. Undersigned counsel is unable to ascertain sufficient facts at this time to
23 establish that Petitioner's supervised release was revoked according to the procedures
24 established by law. Undersigned counsel is also unable to ascertain sufficient facts at this
25 time to establish that there is a significant likelihood of removal in the reasonably
26 foreseeable future. *See Zadvydas v. Davis*, 533 U.S. 678 (2001). Accordingly, Respondents
27 defer to the Court on the appropriate relief. *See* 8 U.S.C. § 1231(a)(3); 8 C.F.R.
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1 § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-BJW, 2026 WL 218936, at *1 (S.D.
2 Cal. Jan. 27, 2026) (“The habeas statute does not empower courts to manage ICE
3 supervision programs.”) (citing 28 U.S.C. § 2241(c)(3)); *Khachikian v. Casey*, No. 25-cv-
4 3737-GPC-JLB, ECF No. 13 (S.D. Cal. Jan. 13, 2026) (“Ultimately, ICE has discretion to
5 impose conditions on release.”).

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7 DATED: May 15, 2026

ADAM GORDON
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9 s/ Erin Dimbleby
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