ADAM GORDON
United States Attorney
ANTONIO ESTRADA
Special Assistant U.S. Attorney
California Bar No. 321247
Office of the U.S. Attorney
880 Front Street, Room 6293
San Diego, CA 92101-8893
Telephone: (619) 546-8664
Email: Antonio.Estrada@usdoj.gov

Attorneys for Respondents

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

TAKHIR RUSTAMOVICH SABIROV,

Petitioner,

v.

CHRISTOPHER J. LAROSE, et al,

Respondents.

Case No.: 26-cv-03213-RFL-AHG

SUPPLEMENTAL BRIEFING

Respondents provide the following supplemental briefing pursuant to this Court's Order on June 11, 2026. ECF No. 14.

To answer the Court's first question, DHS Counsel informed Counsel for Respondents that Petitioner had filed a Motion to Reopen (Motion) with the Board of Immigration Appeals (BIA). DHS Counsel informed Counsel for Respondent's that this Motion included an automatic stay of removal. However, contrary to the initial assessment, DHS Counsel confirmed that this Motion with the BIA does not come with an automatic stay (auto-stay). Therefore, the Petitioner does not have an active stay granted by the BIA. The Motion remains pending. Counsel for Respondents apologize for the confusion.

To answer the Court's second question, DHS Counsel is unable to provide a time frame as to how long the BIA will take to adjudicate the pending Motion. DHS counsel is also unable to provide counsel for Respondents with a time frame of an appeal of that Motion. ICE would not stop removal efforts since the appeal does not come with an auto-stay and currently the motion for stay is still pending.

To answer the Court's third question, in Petitioner's removal proceedings, there only appears to be one continuance requested by Petitioner, and there appears to be no continuances requested by DHS. *See* Exhibit 1 (Personal Centric Query Service Printout). As such, this factor should be considered neutral. *See id.*

DATED: June 15, 2026

ADAM GORDON
United States Attorney

s/ Antonio Estrada
ANTONIO ESTRADA
Special Assistant United States Attorney