

1 ERIC GRANT  
United States Attorney  
2 AUDREY B. HEMESATH  
Assistant United States Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 (916) 554-2700

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6  
7 IN THE UNITED STATES DISTRICT COURT  
8 EASTERN DISTRICT OF CALIFORNIA

9 Y.S.G.,

10 Petitioner,

11 v.

12 TONYA ANDREWS, in official capacity, Facility  
13 Administrator of Golden State Annex, et al.,

14 Respondents.

CASE NO. 2:25-CV-1884 TLN SCR

RESPONDENTS' MOTION TO DISMISS  
THE PETITION AND RETURN TO WRIT  
OF HABEAS CORPUS; OPPOSITION TO  
MOTION TO ENFORCE

15 Date: October 16, 2025  
16 Time: 10 a.m.<sup>1</sup>

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28 <sup>1</sup> The United States does not request oral argument and submits that this matter may be appropriate for resolution on the pleadings.

1 **NOTICE OF MOTION**

2 Please take notice that on October 16, 2025, at 10:00am, before the Honorable Sean Riordan,  
3 501 I Street, Sacramento, California, Respondents, by their attorneys, will move this Court for an order  
4 dismissing this action for lack of subject matter jurisdiction. Respondents’ motion is based on this  
5 notice, the points and authorities in support of this motion, and other good cause.  
6

7 **STATEMENT OF RELIEF**

8 Respondents move for an order dismissing the Petition for Writ of Habeas Corpus and Motion to  
9 Enforce for lack of subject matter jurisdiction. In the alternative, the Petition and Motion should be  
10 denied.  
11

12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **I. FACTUAL HISTORY SINCE THE COURT ORDERED YSG RELEASED**

14 On July 14, 2025, this Court ordered Petitioner released from immigration detention—an order  
15 that Respondents immediately complied with.

16 **A. Immigration Judge Bond Hearing**

17 On August 27, 2025, in response to a motion by the government, the immigration judge  
18 conducted a bond redetermination hearing. This hearing comported with this Court’s order that any re-  
19 detention of Petitioner must be preceded by “a hearing before an immigration judge to determine  
20 whether detention is warranted. At the hearing, the Government shall bear the burden of establishing, by  
21 clear and convincing evidence, that Petitioner poses a danger to the community or a risk of flight.” ECF  
22 14. The Immigration Judge also denied YSG’s motion to change venue, finding that YSG did not  
23 demonstrate good cause.

24 1. IJ Bond Hearing

25 The bond hearing was audio recorded. ECF 28-1 (Transcript of Bond Proceedings). YSG  
26 appeared via video appearance, represented by counsel. ECF 28-1 pg. 321. Family members of YSG  
27 also attended via video, including his step-father and brother. *Id.*  
28

1 At the outset of the hearing, the IJ stated that she was applying the burden of proof contemplated  
2 by the district court's order: "We're here today for a litigation bond at which the department bears the  
3 burden to prove by clear and convincing evidence that either respondent is a danger or that he is such a  
4 significant flight risk that no amount of monetary and/or non-monetary conditions can adequately  
5 mitigate those risks." ECF 28-1 pg. 322. The IJ confirmed on the record that YSG could proceed in  
6 English and that he wished for his counsel to represent him. *Id.* She gave him an extensive advisal of  
7 rights. ECF 28-1 pg. 323.

8 The IJ then took time to identify all of the pieces of record evidence. ECF 28-1 pg. 323-24. The  
9 IJ considered YSG's objections to two pieces of evidence: the FBI rap sheet and the I-213 record (record  
10 of deportable/inadmissible alien). The IJ overruled YSG's objection to the reliability of the FBI rap  
11 sheet but decided not to admit the I-213. The IJ admitted the remaining items of evidence, which were  
12 undisputed. EF 28-1 pg. 327-28.

13 The IJ then took arguments from the parties, again noting that the government bore the burden of  
14 proof. The government highlighted YSG's arrest after he was released on bond, and noted that YSG did  
15 not dispute that there were violations of his supervised release. YSG's counsel spoke extensively on his  
16 behalf, highlighting the passage of time since the arrest. ECF 28-1 Pg. 328-30.

17 The IJ exercised her discretion in declining to hear witness testimony, pursuant to 9.3(e)(6) of  
18 the immigration court practice manual. ECF 28-1 pg. 330.

19 At the conclusion of the hearing, the IJ orally pronounced that she was denying bond and issued  
20 YSG his appeal rights. ECF 28-1 pg. 331.

21 2. Motion for Change of Venue

22 The IJ denied YSG's motion to change venue orally at the bond hearing, and again in her written  
23 decision. ECF 28-1 pg. 331, 28-1 pg. 304. The IJ found that DHS was seeking to re-detain YSG  
24 following his release pursuant to the district court's order from Golden State Annex. The IJ would  
25 typically have presided over the corresponding detained case. ECF 28-1 pg. 305. The IJ detailed the  
26 possibility of video participation for all participants, and noted that YSG, his counsel, and his supporters  
27 availed themselves of this option. ECF 28-1 pg. 305. The IJ found no due process violation in the video  
28

1 hearing and found that YSG had established no good cause to transfer the hearing to a different venue.  
2 ECF 28-1 pg. 305.

3 3. IJ Written Bond Decision

4 The IJ issued a comprehensive nine-page written order denying bond, finding that the  
5 government met its burden of proving both dangerousness and flight risk. ECF 28-1 pg. 304-313.

6 The IJ detailed the documents that YSG submitted in support of his request for bond, as well as  
7 DHS's submission in support of its opposition. ECF 28-1 pg. 305-6. The IJ considered but ultimately  
8 rejected YSG's criticism of the FBI rap sheet, admitting the rap sheet into evidence, but giving it less  
9 evidentiary weight on the question of YSG's citizenship and to the entry regarding the 2024 arrest. ECF  
10 28-1 pg. 306. The IJ confirmed that she was not admitting the I-213 Record.

11 The IJ began her analysis by again acknowledging the district court's order that she determine  
12 whether DHS proved by clear and convincing evidence whether YSG was a danger to the community or  
13 a flight risk. ECF 28-1 pg. 307. She then set forth the legal standard she would be applying under  
14 *Matter of Guerra*, 24 I&N Dec. 37, 39 (BIA 2006), noting that the decision of whether to set a bond  
15 amount was in her discretion. *Prieto-Romero v. Clark*, 534 F.3d 1053, 1067 (9<sup>th</sup> Cir. 2008). ECF 28-1  
16 pg. 307.

17 The IJ assessed dangerousness first, noting the evidence relating to the "recency, extent, and  
18 seriousness of Respondent's criminal record," ECF 28-1 pg. 307, citing *Singh v. Holder*, 638 F.3d 1196,  
19 1206 (9<sup>th</sup> Cir. 2011). The IJ detailed YSG's personal history, focusing on his criminal history and  
20 encounters with law enforcement, specifically: (1) YSG was arrested three times for driving under the  
21 influence of alcohol; (2) YSG was convicted of DUI offense once, which he admitted; (3) when YSG  
22 was 29 years old, he was convicted in California superior court for attempted lewd and lascivious acts  
23 with a minor under California Penal Code sections 644/288(a), for which he was sentenced to an 18-  
24 month term of imprisonment; (4) YSG was arrested in connection with a physical altercation he had  
25 with his ex-partner; (5) in May 2024, YSG was arrested for driving on a license suspended after a DUI,  
26 as well as for operating a vehicle not equipped with a functioning ignition interlock, with charges  
27 pending in Stanislaus County. ECF 28-1 pg. 308.

1 The IJ correctly noted that she was not limited to considering only criminal convictions in  
2 assessing dangerousness. ECF 28-1 pg. 308. *Matter of Urena*, 25 I&N Dec. 140, 140 (BIA 2009). The  
3 IJ found that taken cumulatively, YSG’s criminal record is “extensive and serious.” ECF 28-1 pg. 309.  
4 The IJ found support in both BIA and Supreme Court caselaw for the concept that drunk driving is a  
5 particularly dangerous crime. In addition, the IJ found support in caselaw for the concept that YSG’s  
6 conviction for a child exploitation offense, even if it was a sting, was “exceedingly trouble[ing].” ECF  
7 28-1 pg. 309.

8 The IJ noted the mitigation YSG submitted, including evidence surrounding his mental health  
9 and support from family members and friends. ECF 28-1 pg. 309. But the Court analogized to other  
10 mental health cases and concluded that “while Respondent’s prior lived experiences and mental health  
11 and functioning may help make his behavior more understandable in some sense, the explanation for his  
12 behaviors does not make the behaviors themselves any less dangerous to the community.” ECF 28-1 pg.  
13 310 (internal quotations and citations omitted). The IJ noted that YSG has had many “second chances”  
14 with the criminal justice system, and that even after having been placed constructively on notice that  
15 being arrested for crimes would adversely affect his immigration status, he still could not conform his  
16 conduct to avoid arrest in 2024. ECF 28-1 pg. 310.

17 The IJ found that alternatively the government met its burden of proving via clear and  
18 convincing evidence that YSG is a flight risk. ECF 28-1 pg. 310. The IJ noted his final order of  
19 removal. ECF 28-1 pg. 311. The IJ noted that YSG is appealing the withholding of removal component  
20 of his removal order, as well as the length of time that he has lived in the United States and his family  
21 and community ties. But the IJ found that YSG’s likelihood of prevailing before the Board to be  
22 “exceedingly speculative.” ECF 28-1 pg. 311. Thus, with YSG’s removal from the United States a  
23 near-certainty, in combination with YSG’s “disregard for rules and regulations imposed by state  
24 authorities,” the IJ also found YSG to be a flight risk. ECF 28-1 pg. 312.

## 25 **II. NO REMAINING CASE OR CONTROVERSY**

26 Because Petitioner has received all of the relief he requested in his habeas petition, this matter is  
27 now moot. There is no longer any live case or controversy for this Court to resolve, and the Court must  
28 dismiss the petition. *Picrin-Peron v. Rison*, 930 F.2d 773, 776 (9th Cir.1991) (finding that because

1 petitioner only requested release from custody and had been released, the court could provide no further  
2 relief and the petition was properly dismissed); *see also Abdala v. INS*, 488 F.3d 1061, 1064–65 (9th  
3 Cir.2007) (discussing and collecting cases in which a petitioner's release from detention, parole, or  
4 removal rendered a habeas petition moot); *Flores–Torres v. Mukasey*, 548 F.3d 708, 710 n.3 (9th  
5 Cir.2008) (dismissing as moot a challenge to immigration detention without a hearing because the alien  
6 had subsequently received a hearing).

7 The Court does not have subject matter jurisdiction to consider a habeas claim that is moot.  
8 *McCullough v. Graber*, 726 F.3d 1057, 1060 (9th Cir. 2013). Here, YSG's release from detention, and  
9 subsequent bond hearing that conformed with the Court's order, renders moot all of the claims raised in  
10 his habeas petition. YSG has not sought leave to amend that petition. There is no remaining form of  
11 relief that this Court might give as pertains to YSG's original claims. Therefore, the Court must dismiss  
12 the petition in its entirety as there is no longer a live a case or controversy as relate to the habeas  
13 petition.

### 14 **III. YSG HAS NOT EXHAUSTED ADMINISTRATIVE REMEDIES**

15 Alternatively, the Court should dismiss YSG's motion to enforce as it is premature. YSG has  
16 pursued his recourse of filing an administrative appeal of the immigration judge's order. Because this  
17 administrative appeal is available to him, he must await the outcome of that appeal, rather than  
18 immediately seeking to resume litigation in this Court. “[Courts] require, as a prudential matter, that  
19 habeas petitioners exhaust available judicial and administrative remedies before seeking relief under §  
20 2241.” *Castro-Cortez v. INS*, 239 F.3d 1037, 1047 (9th Cir. 2001), abrogated on other grounds,  
21 *Fernandez-Vargas v. Gonzalez*, 548 U.S. 30 (2006).

22 Because YSG has not awaited the outcome of the BIA appeal, he has not exhausted  
23 administrative remedies, and this Court must dismiss the habeas petition.

### 24 **IV. THE BOND HEARING YSG RECEIVED WAS MORE THAN ADEQUATE**

25 The United States maintains its position that no bond hearing was required under the statute or  
26 Constitution for someone in YSG's situation, having been re-detained following an arrest with resulting  
27 pending criminal proceedings while on release from immigration detention. The United States does not  
28 concede that a bond hearing was constitutionally required under the circumstances of this case.

1 But, the government complied with the Court’s order and YSG was given a bond hearing before  
2 an immigration judge. That bond hearing complied with the Court’s order and more than complied with  
3 any constitutional requirements.

4 The fact that the IJ ultimately reached a bond decision other than the one YSG wanted does not  
5 rise to the level of a constitutional violation. This Court lacks the authority to reassess the evidence  
6 presented at the bond hearing and come to a different conclusion, which is the thrust of what YSG is  
7 now seeking, albeit cloaked in constitutional garb. “[D]iscretionary decisions granting or denying bond  
8 are not subject to judicial review,” *Prieto-Romero v. Clark*, 534 F.3d 1053, 1058 (9th Cir. 2008), and “a  
9 district court may not second guess the IJ’s weighing of the evidence,” *Quan v. Barr*, No. 20-cv08118-  
10 LB, 2021 WL 308610, at \*4 (N.D. Cal. Jan. 29, 2021).

11 YSG received a bond hearing that gave him a meaningful opportunity to be heard, explicitly  
12 applied the burden of proof ordered by this Court, was grounded in the applicable BIA and federal court  
13 precedent, and resulted in a written decision that is thorough, thoughtful, and fair. “The fundamental  
14 requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful  
15 manner.” *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (quotation marks omitted). Due process “is  
16 flexible and calls for such procedural protections as the particular situation demands.” *Id.* at 334  
17 (citation omitted).

18 In assessing whether a given procedural framework affords due process, courts typically assess  
19 three factors: (1) the private interest that will be affected by the official action; (2) the risk of an  
20 erroneous deprivation of such interest through the procedures used, and the probable value, if any of  
21 additional or substitute procedural safeguards; and (3) the government’s interest, including the function  
22 involved and the fiscal and administrative burdens that the additional or substitute procedural  
23 requirement would entail. In applying *Mathews* in the immigration context, this Court must “weigh  
24 heavily” the fact “that control over matters of immigration is a sovereign prerogative, largely within the  
25 control of the executive and the legislature.” *Landon v. Plasencia*, 459 U.S. 21, 34 (1982). This Court  
26 must also consider that Congress “emphatic[ally]” intended the government’s discretionary decisions  
27 regarding detention to be “presumptively correct and unassailable except for abuse.” *Carlson v.*  
28 *Landon*, 342 U.S. 524, 540 (1952).

1 With respect to the first *Mathews* factor, while it is true as a general matter that freedom from  
2 physical restraint “lies at the heart of the liberty that [the Due Process] Clause protects,” *Zadvydas v.*  
3 *Davis*, 533 U.S. 678, 690 (2001) (punctuation omitted), the Supreme Court has clarified that “[i]n the  
4 exercise of its broad power over naturalization and immigration, Congress regularly makes rules that  
5 would be unacceptable if applied to citizens.” *Demore v. Kim*, 538 U.S. 510, 522 (2003). Accordingly,  
6 while “the Fifth Amendment entitles aliens to due process of law in deportation proceedings . . .  
7 detention during deportation proceedings [i]s a constitutionally valid aspect of the deportation process.”  
8 *Id.* at 523. Any assessment of the private interests at stake must therefore account for the fact that the  
9 Supreme Court has never held that noncitizens have a constitutional right to be released from custody  
10 during the pendency of removal proceedings, and in fact has held the opposite. *See id.* at 530; *Carlson*,  
11 342 U.S. at 538. Further, consideration of the private interest also must account for the fact that a  
12 noncitizen without lawful status in the United States is not simply asserting a right to be at liberty, but  
13 rather a right to be at liberty in the United States. *Cf. Reno v. Flores*, 507 U.S. 292, 306 (1993)  
14 (“Congress eliminated any presumption of release pending deportation, committing that determination to  
15 the discretion of the Attorney General.”).

16 With respect to second *Mathews* factor, the framework surrounding the detention of YSG  
17 provides safeguards to protect against arbitrary deprivation of liberty while also protecting the  
18 government’s interests in ensuring that he does not abscond or commit crimes while removal  
19 proceedings are ongoing. He has received a recorded hearing, represented by counsel, where he had the  
20 opportunity to present evidence on flight risk or dangerousness. After the hearing, the immigration  
21 judge issued a thoughtful and careful written detention order. He is availing himself of BIA review of  
22 that detention order. The bond hearing process YSG received is thus flexible and permits an individual  
23 to present any evidence that may bear on his dangerousness or flight risk. *Matter of Guerra*, 24 I. & N.  
24 Dec. at 40-41. Accordingly, the safeguards governing his detention are substantial and more than  
25 adequately protect against the risk of “erroneous deprivation” of liberty.

26 With respect to the third *Mathews* factor, the process YSG received reflects Congress’s intent to  
27 afford “broad discretion” to the government in determining which individuals should remain detained  
28 for removal proceedings, *Nielsen v. Preap*, 139 S. Ct. 954, 966 (2019), and to increase the probability

1 that individuals who are ordered removed are in fact removed. H.R. Rep. 104-469(I) at 123; *Zadvydas*,  
2 533 U.S. at 699-700 (assessing the reasonableness of immigration detention “primarily in terms of the  
3 statute’s basic purpose”). Congress enacted the amendments to the INA based on its concern that “[a]  
4 chief reason why many deportable aliens are not removed from the United States is the inability of the  
5 INS to detain such aliens through the course of their deportation proceedings.” H.R. Rep. 104-469(I), at  
6 123; *see also Demore*, 538 U.S. at 519. “The government has an understandable interest in detaining  
7 such persons to ensure attendance at immigration proceedings, improve public safety, and promote  
8 compliance with the immigration laws.” *Fraihat v. ICE*, 16 F.4th 613, 647 (9th Cir. 2021). The  
9 government’s interest in maintaining the existing procedures for bond hearings to ensure that removal  
10 orders can be promptly executed is thus legitimate and significant. And while YSG may disagree with  
11 Congress’s judgment regarding the importance of detention as a means of ensuring removal, “when the  
12 Government deals with deportable aliens, the Due Process Clause does not require it to employ the least  
13 burdensome means to accomplish its goal.” *Demore*, 538 U.S. at 528. Although YSG is dissatisfied  
14 with the outcome of his bond determination, the IJ properly weighed the evidence and concluded he was  
15 a danger and a flight risk. This Court cannot disturb this discretionary determination. As the Ninth  
16 Circuit has held, “discretionary decisions granting or denying bond are not subject to judicial review.”  
17 *Prieto-Romero*, 534 F.3d at 1058; *see also* 8 U.S.C. § 1226(e).

18 As numerous district courts have held, “a district court may not second guess the IJ’s weighing  
19 of the evidence.” *Quan*, 2021 WL 308610, at \*4; *accord, e.g., Slim v. Nielson*, No. 18-cv-02816-DMR,  
20 2018 WL 4110551, at \*3 (N.D. Cal. Aug. 29, 2018) (same); *Calmo v. Sessions*, No. C 17-07124 WHA,  
21 2018 WL 2938628, at \*4 (N.D. Cal. June 12, 2018) (same). A petitioner may not challenge an IJ’s  
22 discretionary decision denying bond “simply by cloaking an abuse of discretion argument in  
23 constitutional garb.” *Torres-Aguilar v. INS*, 246 F.3d 1267, 1271 (9th Cir. 2001). Rather, when district  
24 courts “review[] the sufficiency of the evidence within the confines of § 1226(e), . . . the question is not  
25 whether this Court believes that the proof establishes . . . that [the petitioner] is a danger to the  
26 community or a flight risk. Rather, the Court must decide whether the IJ relied upon proof that—as a  
27 matter of law—could not establish that conclusion.” *Kharis v. Sessions*, No. 18-CV-04800-JST, 2018  
28 WL 5809432, at \*5 (N.D. Cal. Nov. 6, 2018) (citations omitted).

1 As the Ninth Circuit has recognized, “[t]he Federal Rules of Evidence do not apply strictly in  
2 immigration removal proceedings. . . . [And] bond hearings are particularly informal in nature.” *Singh*,  
3 638 F.3d at 1209-10. “A district judge may not second guess the immigration judge’s weighing of the  
4 evidence” and “differences in interpretation of the facts remained well within the province of the  
5 immigration judge.” *Calmo*, 2018 WL 2938628, at \*4-5. IJs are presumed to have reviewed all  
6 evidence that was before them. *Larita Martinez v. INS*, 220 F.3d 1092, 1095-96 (9th Cir. 2000) (BIA is  
7 presumed to have reviewed all evidence, including supplemental evidence, before it); *Kumar v. Holder*,  
8 388 F. App’x 665, 666 (9th Cir. 2010) (same re IJ) (citing *Larita-Martinez*, 220 F.3d at 1096). “[T]he  
9 BIA [or IJ] does not have to write an exegesis on every contention,” and the Ninth Circuit rejects “any  
10 implication that . . . [the IJ] must expressly parse or refute on the record each individual argument or  
11 piece of evidence offered by the petitioner.” *Najmabadi v. Holder*, 597 F.3d 983, 990 (9th Cir. 2010)  
12 (cleaned up).

13 YSG argues that the IJ abdicated her role as a “neutral decisionmaker” when she did two things:  
14 (1) denied his motion to change venue, and (2) took administrative notice of the underlying removal  
15 order. ECF 28 pg. 15. This argument lacks merit—a judge does not cease to be a “neutral  
16 decisionmaker” when she makes a decision contrary to what a party is advocating. Decisions that rule  
17 against one party are not indicative of bias. *Leslie v. Grupo ICA*, 198 F.3d 1152, 1160 (9th Cir. 1999)  
18 (holding that allegations stemming entirely from a judge’s adverse rulings were an inadequate basis for  
19 recusal); *Liteky v. United States*, 510 U.S. 540, 555 (1994) (“[j]udicial rulings alone almost never  
20 constitute a valid basis for a bias or partiality recusal motion”). The IJ made two common-sense  
21 decisions: (1) that there was no reason to transfer venue when the case would ordinarily have been held  
22 in that court but-for the district court’s release order, where the IJ allowed video appearances and  
23 respondent took advantage of that option; and (2) that it was useful and appropriate to take notice of a  
24 previous decision in respondent’s case that helped fill out the record. Beyond conclusory assertions that  
25 these actions moved the IJ out of her role as a neutral decisionmaker and into an advocate for the  
26 government, respondent presents no evidence that implicates personal bias or prejudice on the part of the  
27 IJ. Respondent also presents no precedent for finding a constitutional violation based on such  
28 administrative-type rulings by an immigration judge.

1 Finally, even if the petition is granted, the appropriate relief is a new bond hearing, not release  
2 from detention. *See e.g., Demore*, 538 U.S. at 532 (Kennedy, J., concurring). “[C]ompelled release of  
3 detainees is surely a remedy of last resort.” *Fraihat*, 16 F.4th at 642. Circuit courts that evaluated  
4 mandatory pre-order detention (pre-*Jennings*) determined that a bond hearing before the IJ is an  
5 appropriate remedy for unreasonably prolonged detention. *See, e.g., Rodriguez v. Robbins*, 804 F.3d  
6 1060, 1084 (9th Cir. 2015), *rev’d, Jennings*, 138 S. Ct. 830; *Sopo v. U.S. Att’y Gen.*, 825 F.3d 1199,  
7 1219 (11th Cir. 2016); *accord, e.g., Mansoor v. Figueroa*, No. 3:17-cv-01695-GPC (NLS), 2018 WL  
8 840253, at \*4 (S.D. Cal. Feb. 13, 2018) (IJs are well suited to assess eligibility for release, while district  
9 court “lacks the factual support to make a determination about Petitioner’s risk of flight or  
10 dangerousness to the community”). To order otherwise would unnecessarily contravene the statute’s  
11 implementing regulations, which place review of custody determinations in the hands of the IJ and the  
12 BIA. Because YSG has already received a constitutionally adequate bond hearing, no further action is  
13 needed in this case. However, if the Court rules otherwise, the appropriate relief here is not release, but  
14 another bond hearing that provides YSG “an opportunity to contest the necessity of his detention before  
15 a neutral decisionmaker and an opportunity to appeal that determination to the BIA.” *Prieto Romero*,  
16 534 F.3d at 1065-66.

17 **V. CONCLUSION**

18 For the foregoing reasons, this Court should dismiss the habeas petition in its entirety as moot.  
19 Alternatively, this Court dismiss the motion to enforce, as YSG has not exhausted administrative  
20 remedies. Alternatively, because Petitioner has been granted a constitutionally adequate bond  
21 redetermination hearing, the Court should deny the petition and motion to enforce on the merits.

22  
23 Respectfully submitted,

24 Dated: September 29, 2025

25 /s/ AUDREY B. HEMESATH  
26 By: \_\_\_\_\_  
27 AUDREY B. HEMESATH  
28 Assistant United States Attorney