UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

K-S-

Petitioner,

v.

E.L. TATUM, JR., Warden of the Federal Correctional Institute, Berlin; **ANDREW WESLING,** Acting Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations, Boston Field Office; **TODD LYONS,** Acting Director, U.S. Immigration and Customs Enforcement; **KRISTI NOEM,** Secretary of U.S. Department of Homeland Security; **PAMELA BONDI,** U.S. Attorney General;

Respondents.

Case No.: 1:25-cv-288-SE-AJ

PETITIONER'S OPPOSITION TO RESPONDENTS' MOTION TO DISMISS OR, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT AND REQUEST FOR HABEAS CORPUS RELIEF

INTRODUCTION

Petitioner K-S- is an asylum seeker from Morocco. He fears going back to Morocco because he was and will be persecuted because of [redacted] In fact, an Immigration Judge (IJ) granted Petitioner asylum almost six months ago. But, instead of releasing K-S- and allowing him to start his life here as an asylee, Respondents appealed the IJ's decision to the Board of Immigration Appeals (BIA) and have since refused to release Petitioner from detention.

Petitioner has been in immigration custody for almost 16 months since July 27, 2024 while pursuing his claim of asylum. Even as an arriving alien subject to mandatory detention pursuant to 8 U.S.C. § 1225(b)(1)(B)(ii), Petitioner still has due process rights under the Fifth Amendment of the U.S. Constitution. Namely, the government cannot mandatorily detain Petitioner without a bond hearing once his detention becomes unreasonably prolonged. Doing so would be a clear violation of his due process rights.

Respondents advance two points in seeking dismissal of Petitioner's habeas corpus petition: (1) Petitioner, as an arriving alien, is entitled only to the process provided by statute; and, (2) even if he does hold protections under the Due Process Clause, Petitioner's detention is reasonable. This Court should reject both arguments and grant this petition.

First, another Judge in this District recently agreed with Petitioner and granted a habeas petition with 14 months of detention. *See Fils-Aime v. FCI Berlin*, 2025 DNH 126P, 2025 U.S. Dist. LEXIS 215595, at *8 (D.N.H. Oct. 31, 2025) ("Under these specific facts and circumstances, the court finds that the petitioner's 14-month detention without a bond hearing is unreasonably prolonged."). Further, courts across this country have agreed with Petitioner. *See Abdul-Samed v. Warden of Golden State Annex Det. Facility*, No. 25-cv-98-SAB-HC, 2025 U.S. Dist. LEXIS 142973, at *6 (E.D. Cal. July 25, 2025) ("'essentially all district courts that have

considered the issue agree that prolonged mandatory detention pending removal proceedings, without a bond hearing, will—at some point—violate the right to due process.'") (citing *Martinez v. Clark*, No. C18-1669-RAJ-MAT, 2019 U.S. Dist. LEXIS 197895, at *6 (W.D. Wash. May 23, 2019)). In reaching this decision, these courts have necessarily found that Respondents' argument that Petitioner is only afforded the process contained within 8 U.S.C. § 1225(b) is without merit.

Second, contrary to what Respondents suggest, Petitioner's detention has reached the level of unreasonable. Respondents have already deprived Petitioner of his liberty for nearly 16 months at penal facilities with no clear end in sight. Under the non-exhaustive reasonableness test that Petitioner asks this Court to apply, the specific facts and circumstances weigh in favor of finding that Petitioner's nearly 16-month detention without a bond hearing is unreasonably prolonged.

Once the detention becomes prolonged, the remedy is to require that Petitioner be provided a bond hearing before a neutral IJ, at which Respondents have the burden under the clear and convincing evidence standard to justify Petitioner's continued detention. For these reasons, this Court should grant Petitioner's Petition for Writ of Habeas Corpus (DN 1), and deny Respondents' Motion to Dismiss or, in the Alternative, for Summary Judgment (DN 16).

FACTUAL BACKGROUND

Petitioner K-S- is a 25-year-old asylum seeker from Morocco. Exhibit 8 (IJ Dec.) at 1-2.[1] He fears that he will be killed if he returns to Morocco because of [redacted] DN 1-1 (Petitioner's Affidavit) at ¶¶2-5.

[1] Petitioner incorporates Exhibits 1 to 7, which were attached to his habeas corpus petition. *See* DN 1-1 – 1-7. In addition, Petitioner submits additional Exhibits as part of this brief. *See* Exhibit 8 (IJ Dec.), Exhibit 9 (Department of Homeland Security Brief to the BIA); Exhibit 10 (Petitioner's Brief to the BIA); Exhibit 11 (Petitioner's Motion to Remand to the BIA); Exhibit 12 (Parole Request Denial); Exhibit 13 (2004 ICE Policy).

When Petitioner was fifteen years old, he went to Turkey to pursue an opportunity to play soccer. Exhibit 8 at 4. However, due to the COVID-19 pandemic, all international players, including Petitioner, had to leave Turkey. DN 1-1 at ¶21. Because Petitioner feared going back to Morocco, he destroyed his passport and then traveled to Germany where he applied for asylum. *Id.* at ¶22; Exhibit 8 at 4. Ultimately, Petitioner's asylum application was denied, and he was told he would be removed to Morocco. Exhibit 8 at 4.

In July of 2024, attempting to make it to Canada to claim asylum, Petitioner hid in the trunk of a car that was in a parking lot full of cars headed to the United States and Canada via vehicle carrier ship. DN 1-1 at ¶27. After staying in the trunk of the vehicle for several days, Petitioner was detained by the ship's crew as a stowaway. *Id.* The ship arrived in Rhode Island on July 27, 2024, and Petitioner was handed over to the United States immigration authorities. *Id.* at ¶28; DN 1-2. Petitioner was taken into immigration custody pursuant to 8 U.S.C. § 1225 and was transferred to the Donald W. Wyatt Detention Center Facility in Central Falls, Rhode Island (Wyatt Detention Facility). DN 16-2 at ¶6.

After Petitioner's initial border encounter interview, Petitioner passed the credible fear interview. DN 1-3 (Notice of Referral to Immigration Judge; Record of Sworn Statement). On May 27, 2025, the IJ granted Petitioner asylum. Exhibit 8 at 10 ("The Court finds that asylum law in the United States exists for protection of people just such as [Petitioner] and is inclined to grant that protection to [him] as a matter of discretion."). In light of the asylum decision, the IJ did not reach statutory withholding of removal under 8 U.S.C. § 1231(b)(5) and protection under the CAT. *Id.* On June 24, 2025, Respondents timely appealed the IJ's decision granting asylum to the BIA. DN 1-5. The parties have submitted their briefs and are waiting for a decision by the BIA. *See* Exhibit 9 (Department of Homeland Security Brief to the BIA); Exhibit 10

(Petitioner's Brief to the BIA). Petitioner also filed his motion to remand, requesting for a remand to consider new evidence if the BIA sustains Respondents' appeal. Exhibit 11 (Petitioner's Motion to the BIA).

On or about July 8, 2025, Petitioner submitted a parole release request to Respondents. DN 1-6. On August 13, 2025, Respondents denied Petitioner's parole request. Exhibit 12 (Parole Request Denial). Petitioner has remained in immigration custody since July 27, 2024 and is currently at the Plymouth County Correctional Facility in Plymouth, Massachusetts (Plymouth Detention Facility), where he was transferred to from the Federal Correctional Institution (FCI) in Berlin, New Hampshire on or around August 22, 2025. DN 16-2 at ¶¶5, 15-16.

ARGUMENT

I. PETITIONER, AS AN ARRIVING ALIEN, HAS DUE PROCESS RIGHTS TO AN INDIVIDULAIZED BOND HEARING WHEN DETENTION BECOMES UNREASONBALY PROLONGED

A. Due Process Requires an Individualized Bond Hearing for an Arriving Alien Once the Detention Becomes Unreasonably Prolonged

There can be no doubt that Petitioner, even as an arriving alien subject to mandatory detention pursuant to 8 U.S.C. § 1225(b)(1)(B)(ii), has due process rights not to be unreasonably detained without a bond hearing. *Fils-Aime v. FCI Berlin*, 2025 U.S. Dist. LEXIS 215595, at *8 ("The Court does not reach the question of whether receiving withholding of removal may entitle the petitioner to greater due process rights with respect to his detention under 1225(b), because it joins the several district courts and circuit courts that have suggested and held that prolonged mandatory detention pending removal proceedings, without a bond hearing, will at some point violate the right to due process."); *see also Hernandez-Lara v. Lyons*, 10 F.4th 19, 28 (1st Cir. 2021) ("The government's exercise of power to detain immigrants pending removal 'is subject to important constitutional limitations.'") (quoting *Zadvydas v. Davis*, 533 U.S. 678, 695 (2001));

A.L. v. Oddo, 761 F. Supp. 3d 822, 825 (W.D. Pa. 2025) (finding arriving aliens have constitutional due process protections).

Indeed, another Judge in this District recently made it clear that due process requires an individualized bond hearing for arriving aliens subject to mandatory detention once their detention becomes unreasonably prolonged. *Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *8-9 (holding that "prolonged mandatory detention pending removal proceedings, without a bond hearing, will at some point violate the right to due process"); *see also A.L.*, 761 F. Supp. 3d at 825 (same); *Leke v. Hott*, 521 F. Supp. 3d 597, 603 (E.D. Va. 2021) (same); *Kydyrali v. Wolf*, 499 F. Supp. 3d 768, 772 (S.D. Cal. 2020) ("[This] Court joins the majority of courts across the country in concluding that an unreasonably prolonged detention under 8 U.S.C. § 1225(b) without an individualized bond hearing violates due process."); *Djelassi v. ICE Field Office Dir.*, 434 F. Supp. 3d 917, 930 (W.D. Wash. 2020) (finding that 18-month detention of arriving alien without bond hearing violates due process); *Jamal A. v. Whitaker*, 358 F. Supp. 3d 853, 859 (D. Minn. 2019) (finding that 19-month detention of arriving alien without bond hearing violates due process); *Tuser E. v. Rodriguez*, 370 F. Supp. 3d 435, 442-43 (D. N.J. 2019) (same).

Respondents advance two arguments in response to Petitioner's assertion. First, Respondents wrongly rely on *Shaughnessy v. United States ex rel Mezei*, 345 U.S. 206, 216 (1953) for their argument that Petitioner is only entitled to the process authorized by statute. Second, Respondents misconstrue and misapply Supreme Court precedent in *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018), *Demore v. Hyung Joon Kim*, 538 U.S. 510 (2003), and *Zadvydas*, 533 U.S. at 678 in arguing that Petitioner's detention is constitutionally permissible as it is authorized by statute, related to a statutorily permissible purpose, and it has not become unreasonably prolonged.

1. *Mezei does not foreclose Petitioner's right to bring a constitutional claim for an individualized bond hearing*

Respondents wrongly suggest that Petitioner is only protected by the process authorized by Congress in 8 U.S.C. § 1225(b)(1)(B)(ii), which authorizes detention for the entirety of the removal proceedings. Rather than standing for the proposition that arriving aliens have no constitutional protections when it comes to their detention, *Shaughnessy v. United States ex rel Mezei* instead establishes that noncitizens who have been ordered excluded on ***national security*** grounds do not have due process rights with respect to their admission. *See Shaughnessy v. United States ex rel Mezei*, 345 U.S. 206, 216 (1953) ("respondent's ***right to enter*** the United States depends on the Congressional will") (emphasis added). Here, it is the power to ***detain***, not the power to ***admit***, that is at issue and Respondents have not alleged that Petitioner raises any national security issues. *See Mezei*, 345 U.S. at 208 (explaining that Mr. Mezei had been ordered excluded after being deemed a threat to national security). Respondents simply take *Mezei* too far by suggesting that the Supreme Court held that continued exclusion and detention without a hearing of an arriving alien does not deprive the alien of any statutory or constitutional rights, and there is nothing in *Mezei* that otherwise suggests Petitioner as an arriving alien has no protections against unreasonably prolonged detention under the Due Process Clause. *See Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *8 n.27 ("The petitioner's case is also distinguishable from [*Mezei*], cited by the respondents, because the court's denial of a bond hearing there was grounded in the potential national security threat represented by the petitioner, a circumstance not applicable here."). *See also Rosales-Garcia v. Holland*, 322 F. 3d 386, 413-14 (6th Cir. 2003) (distinguishing *Mezei* from cases involving the detention of an arriving alien noting that *Mezei* is limited to national security concerns); *Leke*, 521 F. Supp. 3d at 604; *Kydyrali*, 499 F. Supp. at 768; *Lett v. Decker*, 346 F. Supp. 3d 379, 385–86 & n.11 (S.D.N.Y. 2018) (same), *vacated on the mootness ground* in 2020 U.S. App. LEXIS 42655 (2d Cir. July 30, 2020); *Kouadio v. Decker*, 352 F. Supp. 3d 235, 240

(S.D.N.Y. 2018) (same); *Clerveaux v. Searls*, 397 F. Supp. 3d 299, 315-16 (W.D.N.Y. 2019) (same).

2. *While Petitioner's detention is statutorily authorized, it is constitutionally impermissible as it has become unreasonably prolonged*

In seeming to recongize that *Mezei* does not support the argument that Petitioner has no protections against unreasonably prolonged detention under the Due Process Clause, Respondents rely on *Jennings*, *Kim*, and *Zadvydas* to say that Petitioner's detention is constitutuionally permissible. However, *Jennings* does nothing to undermine Petitioner's protection under the Due Process Clause as *Jennings* was not a constitutional ruling. Rather, *Jennings* merely held that the statute under which Petitioner is detained—8 U.S.C. § 1225(b)(1)(B)(ii)—authorizes detention without a bond hearing. *Jennings*, 138 S. Ct. at 842-47. But the Supreme Court specifically declined to address whether prolonged detention without a bond hearing under this statute is constitutionally permissible. *Id.* at 851 ("[W]e do not reach [the constitutional] arguments.").

Respondents then turn to *Demore* to answer that question, however, as in *Jennings*, the Supreme Court did not hold that prolonged detention was constitutionally permissible as applied to individual detainees. Rather, the Supreme Court found that the mandatory detention statutory scheme in 8 U.S.C. § 1226(c) was facially constitutional.[2] *See Demore*, 538 U.S. at 513 (reasoning that Congress may require noncitizens be detained "for the brief period necessary for their removal proceedings."). But, the Court did not foreclose the possibiltiy for indiviudal detainees to bring constitutional challenges against their own prolonged detention under the statute and many courts have since ordered a bond hearing for noncitizens being detained under 8 U.S.C. § 1226(c) once

[2] Although *Demore* involved a different mandatory detention statute than is at issue here, Petitioner "sees no reason not to apply the same factor[s]" in assessing the reasonableness of his detention. *A.L.*, 761 F. Supp. 3d at 826, *accord by Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *10.

their detention became unreasonably prolonged. *See Rocha v. Barr*, 422 F. Supp. 3d 472, 480 (D.N.H. 2019) ("But courts, including this one, have applied the [non-exhaustive reasonablness] factors or a similar listing to evaluate whether detention under § 1226(c) has been unconstitutionally prolonged."); *Smorodska v. Strafford Cnty. Dep't of Corr.*, No. 1:20-cv-446-JL, Order (doc. no. 31) at *3 (D.N.H. May 14, 2020) (same). *See also German Santos v. Warden Pike Cty. Corr. Facility*, 965 F.3d 203, 206 (3d Cir. 2020) (affirming Third Circuit's precedent that when the length of 8 U.S.C. § 1226(c) detention becomes unreasonable, noncitizens have a due process right to a bond hearing where the government bears the burden of proof); *Hylton v. Decker*, 502 F. Supp. 3d 848, 851 (S.D.N.Y. 2020) (ordering a bond hearing for individual detained for 14 months under 8 U.S.C. § 1226(c)); *Rodriguez v. Nielsen*, No. 18-cv-04187-TSH, 2019 U.S. Dit. LEXIS 4228, at *2 (N.D. Cal. Jan. 7, 2019) (concluding that 440-day detention under 8 U.S.C. § 1226(c) with no specific end date in sight violated the petitioner's due process rights and ordering an individualized bond hearing); *Hechavarria v. Sessions*, No. 15-CV-1058, 2018 U.S. Dist. LEXIS 188499, at *1-2 (W.D.N.Y. Nov. 2, 2018) (concluding that petitioner's five-year detention under 8 U.S.C. § 1226(c) violated due process and requiring that he be released unless a "neutral decision-maker determines by clear and convincing evidence that his detention necessarily supports a legitimate and compelling regulatory purpose").

Finally, contrary to Respondents' view, *Zadvydas* in fact supports Petitioner's constitutional claim. *Zadvydas* stands for the universal proposition that immigration detention is limited by the Due Process Clause. *Zadvydas*, 533 U.S. at 690. This central holding of *Zadvydas* applies to all noncitizens, including both removable and inadmissible noncitizens. *See Clark v. Suarez Martinez*, 543 U.S. 371, 386 (2005) (apply the *Zadvydas* holding to inadmissible aliens); *Rosales-Garcia*, 322 F. 3d at 409 (holding that "excludable aliens . . . are clearly protected by the

Due Process Clause of the Fifth and Fourteenth Amendments."). *See also Hernandez-Lara*, 10 F.4th at 28 ("The government's exercise of its power to detain immigrants pending removal 'is subject to important constitutional limitations.'") (quoting *Zadvydas*, 533 U.S. at 695). Immigration detention may become constitutionally impermissible, even if it is statutorily authorized, if it becomes unreasonably prolonged. *See Zadvydas*, 533 U.S. at 690 (internal quotation marks omitted) (explaining due process requires "adequate procedural protections" to ensure that the government's asserted justification for physical confinement "outweighs the individual's constitutionally protected interest in avoiding physical restraint.").

B. Petitioner's Detention Has Become Unreasonably Prolonged

This Court should apply the non-exhaustive reasonableness test and hold that Petitioner's mandatory detention is unreasonable and he should be given a bond hearig. As *Fils-Aime* applied, this Court should consider four factors: (1) the length of detention, (2) the likely duration of future detention, (3) the reasons for the delay, and (4) the conditions of confinement as to whether they are meaningfully different from criminal punishment. *See Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *9 (applying the four-factor test); *see also A.L.*, 761 F. Supp. 3d at 826 ("In assessing whether detention has become unreasonable, this Court sees no reason not to apply the same factors laid out in *German Santos*" which provides these four factors).

First, the length of detention favors Petitioner's habeas corpus relief. As of the filing of this brief, Respondents have detained Petitioner for almost sixteen months. Generally, prolonged "detention is likely to be unreasonable if it lasts for more than one year during removal proceedings before the agency, excluding any delays due to the alien's dilatory tactics." *Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *11 (internal quotations omitted). Courts have found detention less than sixteen months to be unreasonable. *See A.L.*, 761 F. Supp. 3d at 826 ("Petitioner has been held in

custody without a bond hearing for nearly ten months."); *Lett*, 346 F. Supp. 3d at 387 (10 months of detention); *Rocha*, 422 F. Supp. 3d at 481 (finding that "the one-year period" of detention "is persuasive"); *Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *9 (14 months of detention).

Second, the likely duration of future detention favors Petitioner's habeas corpus relief. Respondents have appealed the IJ's grant of asylum and this appeal remains pending before the BIA. Even if the BIA sustains Respondents' appeal, the BIA will have to remand the case to the IJ to consider Petitioner's claims for statutory withholding of removal under 8 U.S.C. § 1231(b)(5) and protection under the CAT. Exhibit 8 at 10 ("FURTHER ORDER: His application for withholding of removal and protection under the Convention Against Torture is not reached."). It is not readily foreseeable when his removal proceedings would end given the nature of his proceedings and Petitioner's detention would likely continue while his appeals and remand proceedings are adjudicated, which could take several more months if not more than a year. Thus, this factor favors Petitioner. *See A.L.*, 761 F. Supp. 3d at 826 ("[I]t is likely that Petitioner's detention will continue while Petitioner's appeal from the denial of his request for asylum is pending, which could take months."); *Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *11 ("It is likely that Petitioner's detention will continue while his appeals are adjudicated, which could take several months."). *See also Smorodska*, No. 1:20-cv-446-JL, Order at *4 ("But even assuming that the BIA may issue a final removal order [in three months], Smorodska has already been detained for almost 14 months.").

Third, "[t]he reasons for the delay also weigh in favor of unreasonableness." *A.L.*, 761 F. Supp. 3d at 826. Petitioner prevailed in his asylum claim before the IJ. Respondents are now appealing this decision, and Respondents have not alleged that Petitioner has caused any delay in his proceedings. In fact, it is Respondents' "policy to favor release of [Petitioner] who ha[s] been

granted protection relief by an [IJ], absent exceptional concerns such as national security issues or danger to the community and absent any requirement under law to detain." Exhibit 13 (ICE 2004 Policy) at 4. Moreover, this Court does "not consider bond fide immigration proceedings, initiated by the alien, as grounds to deny a bond hearing[.]" *Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *13 (internal quotations omitted); *A.L.*, 761 F. Supp. 3d at 826 ("Delays while he exercises the rights afforded to him by statute cannot be held against him *German Santos*, 965 F.3d at 212.").

Fourth, the conditions of confinement as to whether they are meaningfully different from criminal punishment favor Petitioner's habeas relief. Petitioner has been detained at three detention facilities—the Wyatt Detention Facility, FCI Berlin, and the Plymouth Detention Facility—all of which are "penal facility[ies]." *Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *13-14.

Because all four factors favor the instant habeas relief, this Court should order "a bond hearing before an immigration judge at which the government bears the burden of proving [] that the alien should not be released on bond." *Fils-Aime*, 2025 U.S. Dist. LEXIS 215595, at *14; *A.L.*, 761 F. Supp. 3d at 826 ("Respondents must justify Petitioner's continued detention by a showing of clear and convincing evidence that Petitioner would likely flee or pose a danger to the community if released.") (citing *German Santos*, 965 F.3d at 213-14).

II. DUE PROCESS REQUIRES THAT RESPONDENTS BEAR THE BURDEN OF PROVING THAT PETITIONER SHOULD CONTINUE TO BE DETAINED BY CLEAR AND CONVINCING EVIDENCE

Due process requires that Respondents prove that Petitioner's unreasonably prolonged detention is justified by clear and convincing evidence. Indeed, for an asylum seeker who did not have a lawful status other than the status of seeking asylum and was not in prolonged detention, the First Circuit found that the burden should be on Respondents to justify the detention. *See*

Hernandez-Lara, 10 F.4th at 41 (requiring the government "to either (1) prove by clear and convincing evidence that she poses a danger to the community or (2) prove by a preponderance of the evidence that she poses a flight risk"). In the case of prolonged detention like Petitioner's detention, this Court should adopt the clear and convincing evidence standard for both prongs. *See A.L.*, 761 F. Supp. 3d 826 ("Respondents must justify Petitioner's continued detention by a showing of clear and convincing evidence that Petitioner would likely flee or pose a danger to the community if released"); *Kydyrali*, 499 F. Supp. at 774-75 ("Petitioner must be provided a bond hearing before an immigration judge, where the government bears the burden of establishing by clear and convincing evidence that Petitioner is a danger to the community to such a flight risk..."); *Lett*, 346 F. Supp. 3d at 384 ("the Court finds that Petitioner's Due Process rights require that he be afforded an individualized bond hearing during which the Government must prove by clear and convincing evidence that his continued detention is justified"); *Kouadio*, 352 F. Supp. 3d at 241 ("Petitioner is entitled to a bond hearing at which the government must show, by clear and convincing evidence, that Petitioner's dangerousness or flight risk justifies his continued detention."). In the alternative, this Court should require the standard of burden established in *Hernandez-Lara*: clear and convincing evidence for the dangerousness prong and preponderance of evidence for the flight risk prong.

CONCLUSION

For the reasons stated above, this Court should grant Petitioner's habeas corpus petition and deny Respondents' motion to dismiss or for summary judgment.

Date: November 19, 2025

K-S-,

By and through his Counsel,

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