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7 Attorneys for Respondents

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

10 ANSELMO ROMERO SANCHEZ,

11 Petitioner,

12 v.

13 CHRISTOPHER J. LaROSE, Senior Warden  
14 Otay Mesa Detention Center; PAMELA  
BONDI, United States Attorney General;  
15 KRISTI NOEM, Secretary of the  
Department of Homeland Security;  
16 PATRICK DIVVER, ICE San Diego Field  
Office Director, in their official capacities,

17 Respondents.  
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Case No.: 25-cv-3136-JLS(JLB)

**RESPONDENTS'  
SUPPLEMENTAL RESPONSE  
PURSUANT TO ECF NO. 8**

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1 The Court has asked Respondents to file a supplemental response to the pending  
2 petition to address the status of Petitioner’s parole prior to his re-detention in October  
3 2025. Based on ICE’s review of its records and databases, Petitioner was previously  
4 released from DHS custody, however ICE ERO San Diego does not currently have  
5 information or records related to that prior detention and release. *See* Declaration of  
6 Ramon Meraz.

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8  
9 DATED: December 1, 2025

10 Respectfully submitted,

11 ADAM GORDON  
12 United States Attorney

13 *s/Tom Merritt*  
14 TOM MERRITT  
15 Assistant United States Attorney  
16 Attorney for Respondents  
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