



- 5) **Court Inquiry:** Whether Petitioner has requested a bond hearing before the Immigration Judge following the most recent detention.

**Government Response:** The Petitioner did not request, nor has the Petitioner received a bond hearing.

The Government reiterates its December 4, 2025 response and respectfully requests that the Court deny Petitioner's request for habeas relief and grant the Government's motion to dismiss. The Court should enter judgment as a matter of law finding that Petitioner is lawfully subject to mandatory detention pursuant to 8 U.S.C. § 1225(b)(2).

Respectfully submitted,

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United States Attorney

By: */s/ Jill O. Venezia by permission for*  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Instrument was sent via ECF on December 31, 2025. to all counsel of record.

*/s/Jill O. Venezia by permission for*  
ELIZABETH F. KARPATI  
Assistant United States Attorney