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

11 ALFONSO RANGEL VELAZQUEZ,

12 Petitioner,

13 v.

14 CHRISTOPHER J. LAROSE, *et al.*,

15 Respondents.  
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Case No.: 3:25-cv-03474-AGS-DEB

**RESPONDENTS' SUPPLEMENTAL  
 RESPONSE TO PETITIONER'S  
 HABEAS PETITION**

1 In light of the final judgment entered in *Maldonado Bautista v. Santacruz*, No.  
2 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL 3289861 (C.D. Cal. Nov. 20,  
3 2025), Respondents provide this supplemental brief.

4 On July 8, 2025, the Department of Homeland Security (“DHS”) instituted a  
5 notice titled “Interim Guidance Regarding Detention Authority for Applicants for  
6 Admission” (the “Notice”) requiring, in general, that anyone arrested in the United  
7 States and charged with being inadmissible to be considered an “applicant for  
8 admission” under 8 U.S.C. § 1225(b)(2)(A), subject to mandatory detention under 8  
9 U.S.C. § 1225(b)(2)(A) and not subject to detention under 8 U.S.C. § 1226(a).

10 In *Bautista*, the district court declared the Notice unlawful under the  
11 Administrative Procedures Act but did not issue a final judgment. On December 18,  
12 2025, however, the *Bautista* court entered final judgement. *Bautista*, ECF No. 94.  
13 Accordingly, Respondents acknowledge that Petitioner is detained under 8 U.S.C.  
14 § 1226(a) and is entitled to an order from this Court directing a bond hearing be held  
15 pursuant to 8 U.S.C. § 1226(a).

16 Respondents reserve the right to supplement this response in the event of a stay  
17 of enforcement of the *Bautista* final judgment, appellate relief, or a change in DHS  
18 policy.

19 DATED: December 22, 2025

Respectfully submitted,

ADAM GORDON  
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23 *s/ Alyssa Sanderson*  
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