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

10 GERARDO RANGEL OSUNA,

11 Petitioner,

12 v.

13 JEREMY CASEY, in his official as Warden
of Imperial Detention Facility, *et al*,

14 Respondents.
15

Case No.: 25-cv-03668-LL-MMP

**RESPONDENTS RETURN TO
HABEAS PETITION**

16 Petitioner appears to be a member of the Bond Eligible Class certified in
17 *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---,
18 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). The *Bautista* court has entered final
19 judgement as to the Bond Eligible Class. *Bautista*, ECF No. 94. Accordingly,
20 Respondents acknowledge that Petitioner is detained under 8 U.S.C. § 1226(a) and are
21 entitled to an order from this Court directing a bond hearing be held pursuant to 8 U.S.C.
22 § 1226(a).¹

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

26
27 ¹ To the extent the Court issues an order directing a bond hearing under 1226(a),
28 considering current and forthcoming federal holidays, heavy caseloads, and staffing
levels, Respondents respectfully request that such order provide the government 14 days
from issuance to hold such bond hearing.

1 DATED: December 30, 2025

Respectfully submitted,

2 ADAM GORDON
3 United States Attorney

4 *s/ Lisa M. Hemann*
5 LISA M. HEMANN
6 Assistant United States Attorney
7 Attorney for Respondents
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5 Attorney for Petitioner

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

9 GERARDO RANGEL OSUNA,) Case No. **25-cv-03668-LL-MMP**
10)
11 *Petitioner,*) **REPLY TO RESPONDENTS’**
12) **RETURN TO HABEAS**
13 v.) **PETITION**
14)
15 *JEREMY CASEY, in his official as Warden of*)
Imperial Detention Facility, et al.,)
Respondents.)

16
17 Petitioner Gerardo Rangel Osuna (“Petitioner”) respectfully submits this Reply in
18 Response to Respondents Return to Petition for Writ of Habeas Corpus.

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20 Petitioner concurs with Respondents that he appears to be a member of the Bond
21 Eligible Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-
22 SSS-BFM, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025), and that final judgment has
23 been entered as to the Bond Eligible Class. *Bautista*, ECF No. 94.

24
25 Accordingly, Petitioner respectfully requests that this Court issue an order
26 directing that an individualized bond hearing be held within seven (7) days pursuant to
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1 8 U.S.C. § 1226(a). Petitioner is prepared to meet the applicable burden at that hearing
2 and demonstrate that he is neither a danger to the community nor a flight risk.
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5 Dated: January 06, 2026

Respectfully submitted,

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7 /s/ Alfonso Morales

8 Alfonso Morales, Esq.
9 *Attorney for Petitioner*
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CERTIFICATE OF SERVICE

I hereby certify that on January 06, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which constitutes service on all parties or counsel by electronic means as reflected on the Notice of Electronic Filing.

/s/Alfonso Morales
Alfonso Morales, Esq.
Attorney for Petitioner

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