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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.)

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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.

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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,

6
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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