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7 Attorneys for Respondents

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

10 ROMAN AMADOR URBIETA NIETO,

11 Petitioner,

12 v.

13 JEREMY CASEY, Senior Warden,
Imperial Detention Center, *et al.*,

14 Respondents.

Case No.: 26-cv-00186-GPC-AHG

RESPONSE TO PETITION

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17 Petitioner appears to be a member of the Bond Eligible Class certified in
18 *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---,
19 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). The *Bautista* court has entered final
20 judgement as to the Bond Eligible Class. *Bautista*, ECF No. 94. Accordingly,
21 Respondents acknowledge that Petitioner is detained under 8 U.S.C. § 1226(a) and are
22 entitled to an order from this Court directing a bond hearing be held pursuant to 8 U.S.C.
23 § 1226(a).¹

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

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

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DATED: January 16, 2026

Respectfully submitted,

ADAM GORDON
United States Attorney

s/ Mary Cile Glover-Rogers
MARY CILE GLOVER-ROGERS
Assistant United States Attorney
Attorney for Respondents