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7 Attorneys for Respondents

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

10 A.C.,

11 Petitioner,

12 v.

13 CHRISTOPHER J. LAROSE, Warden,
Otay Mesa Detention Center, *et al.*,

14 Respondents.
15

Case No.: 26-cv-00208-RBM-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 is
22 entitled to an order from this Court directing a bond hearing to be held under 8 U.S.C.
23 § 1226(a) or, in the alternative, directing the Department of Homeland Security to honor
24 the “alternative findings” of the immigration judge in her custody redetermination order
25 of December 31, 2025 (Doc. 1-2 at 18 – 19).

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

4 DATED: January 23, 2026

Respectfully submitted,

5 ADAM GORDON
6 United States Attorney

7 *s/ Betsey Boutelle*
8 BETSEY BOUTELLE
9 Assistant United States Attorney
10 Attorney for Respondents
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