

1 ADAM GORDON  
United States Attorney  
2 MICHAEL D. WALLACE  
Assistant United States Attorney  
3 Maryland Bar No. 9912160256  
Office of the U.S. Attorney  
4 880 Front Street, Room 6293  
San Diego, CA 92101-8893  
5 Telephone: 619-546-8714  
Email: Michael.Wallace4@usdoj.gov  
6 Attorneys for Respondents  
7  
8

9 UNITED STATES DISTRICT COURT  
10 SOUTHERN DISTRICT OF CALIFORNIA

11 ZURAB MODREKILADZE  
12  
13 Petitioner,  
14 v.  
15 CHRISTOPHER LAROSE; et al.,  
16 Respondents.  
17  
18

Case No.: 26-cv-0271-JES-DEB  
**RESPONDENTS' RETURN TO  
HABEAS PETITION**

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

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

9  
10 DATED: January 22, 2026

ADAM GORDON  
United States Attorney

11  
12 s/ Michael D. Wallace  
MICHAEL D. WALLACE  
Assistant United States Attorney  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28