

1 Sandra Gotlaufa-Orozco (CA Bar No. 298327)  
2 DYADlaw, P.C.  
3 380 S. Melrose Dr., Suite 414  
4 Vista, California 92081  
5 Tel: (858) 480-1077  
6 sandra.gotlaufa@dyadlaw.com

7 Attorney for Petitioner

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

10 Juan RUIZ DIAZ,

11 Petitioner,

12 v.

13 Christopher J. LAROSE, in his official  
14 capacity as Warden of Otay Mesa  
15 Detention Center; Daniel A.  
16 BRIGHTMAN, in his official capacity as  
17 San Diego Field Office Director, ICE  
18 Enforcement and Removal Operations;  
19 Todd LYONS, in his official capacity as  
20 Acting Director of ICE; Kristi NOEM, in  
21 her official capacity as Secretary of  
22 Homeland Security; Pamela BONDI, in  
23 her official capacity as U.S. Attorney  
24 General,

25 Respondents.

Case No.:

Agency File No.:




26 **STIPULATION IN REGARD TO**  
27 **RETURN TO PETITION**

28 **Judge: Hon. Jinsook Ohta**

- 1 1. Petitioner Juan RUIZ DIAZ (hereinafter “Mr. RUIZ DIAZ”) reasserts that  
2 his continued detention without an individualized hearing violates the Due  
3 Process Clause of the Fifth Amendment.
- 4 2. Mr. RUIZ DIAZ respectfully requests that this Court issue a writ of habeas  
5 corpus requiring that within one day, Respondents release him.
- 6 3. Mr. RUIZ DIAZ reasserts that he is a member of the *Maldonado Mautista v.*  
7 *Santacruz*, No. 5:25-CV-01873-SSS-BFM, ---F.R.D.---, 2025 WL 3288403  
8 Bond Eligible Class, Mr. RUIZ DIAZ. He is entitled to consideration for  
9 release on bond under 8 U.S.C. § 1226(a).
- 10 4. In the alternative, Mr. RUIZ DIAZ consents that this Court issue an order  
11 providing the Government 14 days from issuance to hold a bond hearing  
12 under 8 U.S.C. § 1226(a).
- 13
- 14

15  
16 Dated: February 4, 2026

Signature:   
By: Sandra Gotlaufa-Orozco  
Attorney for Petitioner