

1 ADAM GORDON  
United States Attorney  
2 KELLY A. REIS  
Assistant United States Attorney  
3 California Bar No. 334496  
Office of the U.S. Attorney  
4 880 Front Street, Room 6293  
San Diego, CA 92101-8893  
5 Telephone: (619) 546-8767  
Email: kelly.reis@usdoj.gov

6 Attorneys for Respondents  
7  
8

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

11 LIANG CHEN,  
12

13 Petitioners,

14 v.

15 CHRISTOPHER LAROSE, Senior  
16 Warden, Oay Mesa Detention Center, et al.,

17 Respondents.  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 26-cv-462-AGS-BLM

**RESPONSE TO PETITION**

1 In light of the district court's order in *MalDONADO Bautista v. Santacruz*, No. 5:25-  
2 CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL 3713987 (C.D. Cal. Dec. 18, 2025),  
3 Respondents acknowledge that Petitioner is detained under 8 U.S.C. § 1226(a) and is  
4 entitled to an order from this Court directing a bond hearing be held pursuant to 8 U.S.C.  
5 § 1226(a).<sup>1</sup>

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

8 DATED: January 30, 2026

ADAM GORDON  
United States Attorney

9  
10 s/ Kelly A. Reis  
11 KELLY A. REIS  
Assistant United States Attorney

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26 <sup>1</sup> To the extent the Court issues an order directing a bond hearing under 1226(a),  
27 considering heavy caseloads and staffing levels, Respondents respectfully request that such  
28 order provide the government 14 days from issuance to hold such bond hearing.