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11 **UNITED STATES DISTRICT COURT**
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13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 SANDRA LUGO SALVADOR,
15
16 Petitioners,
17 v.
18 CHRISTOPHER J. LAROSE, et al.,
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20 Respondents.
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Case No.: 26-cv-00553-BAS-MMP

RESPONSE TO PETITION

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

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

DATED: February 6, 2026

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s/Shital H. Thakkar
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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.