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

10 RAMANJOT SINGH
Petitioner,

11 v.

12 JEREMY CASEY, Warden of the Imperial
13 Regional Detention Center; TODD LYONS,
Acting Director of Immigration and Customs
14 Enforcement; KRISTI NOEM, Secretary of
the U.S. Department of Homeland Security;
15 PAMELA BONDI, Attorney General of the
United States.

16 Respondents.
17

Case No.: 26-cv-647

**RETURN TO PETITION FOR
HABEAS CORPUS**

18 Petitioner has filed a habeas petition relying heavily on *Maldonado Bautista v.*
19 *Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D. Cal.)” ECF No. 1, generally. On
20 November 25, 2025, the *Baustista* court certified a nationwide class of detained
21 noncitizens, which the *Baustista* court described as the “Bond Eligible Class.” *Bautista*,
22 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). To be a member of the Bond Eligible
23 Class, a person must (1) have entered the United States without inspection, (2) not have
24 been apprehended upon arrival, and (3) not be detained under 8 U.S.C. § 1126(c), 8
25 U.S.C. § 1125(b)(1) or 8 U.S.C. § 1231 at the time the Department of Homeland
26 Security made its initial custody determination. *Id.* at *9.

27 Here, Petitioner entered the United States without inspection on or about October
28 15, 2011. ECF No. 1 at ¶ 1. Petitioner was encountered and detained immediately

1 following entry. *Id.* DHS detained Petitioner under 8 U.S.C. § 1225(b)(2). Petitioner is
2 not a member of the Bond Eligible Class.

3 On July 8, 2025, the Department of Homeland Security (“DHS”) instituted a
4 notice titled “Interim Guidance Regarding Detention Authority for Applicants for
5 Admission” (the “Notice”) requiring, in general, that anyone arrested in the United
6 States and charged with being inadmissible to be considered an “applicant for
7 admission” under 8 U.S.C. § 1225(b)(2)(A), subject to mandatory detention under 8
8 U.S.C. § 1225(b)(2)(A) and not subject to detention under 8 U.S.C. § 1226(a). In
9 *Bautista*, the district court declared the Notice unlawful under the Administrative
10 Procedure Act. On December 18, 2025, the *Bautista* court entered final judgement.
11 *Bautista*, ECF No. 94. Accordingly, Respondents acknowledge that Petitioner is
12 detained under 8 U.S.C. § 1226(a) and is entitled to an order from this Court directing
13 a bond hearing be held pursuant to 8 U.S.C. § 1226(a).¹

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

17 DATED: February 11, 2026

Respectfully submitted,

18 ADAM GORDON
19 United States Attorney

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21 *s/ Juliet M. Keene*
22 JULIET M. KEENE
23 Assistant United States Attorney
24 Attorney for Respondents
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28 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.