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

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12 BERNABE ZAMORA TORRES,  
Petitioner,

13 v.  
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15 KRISTI NOEM, et al.,  
Respondents.  
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Case No.: 26-cv-1384-JLS-DEB

**RESPONSE TO PETITION**

Judge: Hon. Janis L. Sammartino

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19 Petitioner appears to be a member of the Bond Eligible Class certified in *Maldonado*  
20 *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL  
21 3288403 (C.D. Cal. Nov. 25, 2025). The Ninth Circuit later stayed application of the Order  
22 beyond the Central District of California. However, Respondents acknowledges the prior  
23 orders from this District directing bond hearings pursuant to 8 U.S.C. § 1226(a) in similar  
24 cases.<sup>1</sup> Respondents therefore do not oppose an Order requiring such a hearing for  
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27 <sup>1</sup> To the extent the Court issues an order directing a bond hearing under 1226(a),  
28 considering heavy caseloads and staffing levels, Respondents respectfully request that such  
order provide the government 14 days from issuance to hold such bond hearing.

1 Petitioner.

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3 DATED: March 12, 2026

ADAM GORDON  
United States Attorney

4 *s/Juliet M. Keene*  
5 JULIET M. KEENE  
6 Assistant United States Attorney  
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