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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
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12 GEORGE MAISURADZE,

13 Petitioner,

14 v.

15 CHRISTOPHER J. LAROSE, *et al.*,

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17 Respondents.
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Case Number: 26-cv-01480-CAB-AHG

**PETITIONER'S REPLY TO
RESPONDENTS' RESPONSE**

Honorable Cathy Ann Bencivengo
United States District Judge

1 Petitioner, through counsel, respectfully submits this Reply to Respondents'
2 Response.

3 Respondents concede that Petitioner is detained pursuant to 8 U.S.C. § 1226(a)
4 and that he is entitled to a bond hearing. Accordingly, there is no longer any dispute as to
5 the central issue raised in the Petition—namely, that Petitioner is entitled to a relief.
6

7 Given Respondents' concession, Petitioner respectfully requests that this Court
8 promptly grant the Petition without unnecessary delay. Any further detention without
9 such a hearing would continue to violate Petitioner's statutory and due process rights.
10

11 Petitioner has already endured prolonged and unreasonable detention, and courts
12 routinely order prompt bond hearings within a shorter timeframe. However, a bond
13 hearing alone is not adequate relief under the circumstances. Petitioner has already
14 suffered significant hardship and a violation of his due process rights as a result of his
15 unlawful and prolonged detention. Thus, while a prompt bond hearing is necessary, it
16 does not fully remedy the constitutional harm already incurred.

17 Moreover, the Court should take note of the pattern of discretionary bond denials
18 by immigration judges, particularly findings of flight risk, which frequently align with the
19 enforcement posture underlying Respondents' policies. This pattern raises serious
20 concerns that a bond hearing, without meaningful safeguards, may not provide a genuine
21 or fair opportunity for release.

22 Finally, while Respondents purport to reserve the right to supplement their
23 position in the event of future developments, such speculative possibilities do not justify
24 continued delay in affording Petitioner the relief to which he is currently entitled.
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26 For the foregoing reasons, Petitioner respectfully requests that the Court grant the
27 Petition.

28 Respectfully submitted this 20th Day of March 2026,

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/s/ Laxman Adhikari
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