

1 **Zandra Luz Lopez**
California Bar No. 216567
2 **Federal Defenders of San Diego, Inc.**
225 Broadway, Suite 900
3 San Diego, California 92101-5030
4 Telephone: (619) 234-8467
Facsimile: (619) 687-2666
5 Zandra_Lopez@fd.org

6 Attorneys for Petitioner

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

10
11 **AKYLBK ZHUMAGULOV,**

CASE NO.: 26-cv-01609-RBM-SBC

12 **Petitioner,**

13 **v.**

Traverse

14 **MARKWAYNE MULLIN, Secretary of**
15 **the Department of Homeland Security,**
16 **PAMELA JO BONDI, Attorney General,**
17 **TODD M. LYONS, Acting Director,**
Immigration and Customs Enforcement,
18 **JESUS ROCHA, Acting Field Office**
Director, San Diego Field Office,
19 **JEREMY CASEY, Warden at Imperial**
Detention Center,

20 **Respondents.**

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22 In its return, the government concedes that “this Court should order that
23 Petitioner receive a bond hearing, where the government would bear the burden of
24 proof of establishing, by clear and convincing evidence, that Petitioner poses a
25 danger to the community or a risk of flight.” Doc. 7 at 1–2.

26 Mr. Zhumagulov thus requests that this Court immediately grant his habeas
27 petition. As noted in his petition, he requests that the Court release him from
28 custody. Or, at a minimum, Mr. Zhumagulov requests that the Court order a bond

1 hearing before an immigration judge consistent with the requests made in the
2 Amended Petition, Doc. No. 5, at 16–17.

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Respectfully submitted,

Dated: April 8, 2026

s/ Zandra L. Lopez
Zandra L. Lopez
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Zhumagulov