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7 Attorneys for Respondents

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

10 DOLORES GARCIA-FRAGA,
11 Petitioner,

Case No.: 26-cv-01739-GPC-DDL

RESPONSE TO PETITION

12 v.

13 KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et al.*

14 Respondents.
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21 Petitioner appears to be a member of the Bond Eligible Class certified in
22 *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---,
23 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). The Ninth Circuit later stayed application
24 of the Order beyond the Central District of California. However, Respondents
25 acknowledges the prior orders from this District directing bond hearings pursuant to 8
26 U.S.C. § 1226(a) in similar cases.¹ Respondents therefore do not oppose an order from

27 _____
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.

1 this Court directing a bond hearing be held pursuant to 8 U.S.C. § 1226(a).

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DATED: March 25, 2026

Respectfully submitted,

ADAM GORDON
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s/ Tom Merritt
TOM MERRITT
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Attorney for Respondents