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

[REDACTED],

Petitioner,

v.

CHRISTOPHER LAROSE, Facility Senior
Warden-Otay Mesa Detention Center, *et al.*,

Respondents.

Case No.: 26-cv-01729-JO-DDL

RESPONSE TO PETITION

Respondents, by and through counsel, hereby respond to the Petition for Writ of Habeas Corpus. Undersigned counsel is unable to ascertain sufficient facts at this time to establish that there is a significant likelihood of removal in the reasonably foreseeable future. *See Zadvydas v. Davis*, 533 U.S. 678 (2001). Respondents therefore acknowledge that Petitioner is entitled to be released from custody subject to conditions of supervision. *See* 8 U.S.C. § 1231(a)(3); 8 C.F.R. § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-BJW, 2026 WL 218936, at *1 (S.D. Cal. Jan. 27, 2026) (“The habeas statute does not empower courts to manage ICE supervision programs.”) (citing 28 U.S.C. § 2241(c)(3)); *Khachikian v. Casey*, No. 25-cv-3737-GPC-JLB,

ECF No. 13 (S.D. Cal. Jan. 13, 2026) (“Ultimately, ICE has discretion to impose conditions on release.”).

DATED: March 26, 2026

Respectfully submitted,

ADAM GORDON
United States Attorney

s/ Kim A. C. Gregg
KIM A. C. GREGG
Assistant United States Attorney
Attorney for Respondents