

1 ADAM GORDON  
United States Attorney  
2 CAMILLE SAVEDRA  
California Bar No. 336490  
3 MICHAEL WALLACE  
Maryland Bar No. 9912160256  
4 Assistant U.S. Attorneys  
Office of the U.S. Attorney  
5 880 Front Street, Room 6293  
San Diego, CA 92101-8893  
6 Telephone: (619) 546-5084/8714  
Email: [camille.savedra@usdoj.gov](mailto:camille.savedra@usdoj.gov)  
7 [michael.wallace4@usdoj.gov](mailto:michael.wallace4@usdoj.gov)

8 Attorneys for Respondents

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10 **UNITED STATES DISTRICT COURT**

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12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 ADAM DAHIYA ABDALLA-YAHYA,

14 Petitioner,

15 v.

16 CHRISTOPHER LAROSE; et al.,

17 Respondent.  
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Case No.: 26-cv-02007-DMS-AHG

**RESPONSE TO PETITION**

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21 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject to  
22 mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S. 281  
23 (2018). However, the government acknowledges that courts in this District have repeatedly  
24 inferred a constitutional right against prolonged mandatory detention. Taking into  
25 consideration those prior rulings and the length of time Petitioner has been in custody, the  
26 government concedes that this Court should order that Petitioner receive a bond hearing,  
27 where the government would bear the burden of proof of establishing, by clear and  
28 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.

1 *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12,  
2 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26,  
3 2025).

4  
5 DATED: April 6, 2026

ADAM GORDON  
United States Attorney

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7 *s/ Camille Savedra*  
8 CAMILLE SAVEDRA  
MICHAEL WALLACE  
Assistant United States Attorneys

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