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8 UNITED STATES DISTRICT COURT  
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10 SOUTHERN DISTRICT OF CALIFORNIA

11 REN XUN LIN,

12 Petitioner,

13 v.

14 JEREMY CASEY,  
15 WARDEN OF THE IMPERIAL  
16 REGIONAL DETENTION FACILITY,  
CALIFORNIA; et al.,

17 Respondents.  
18

Case No.: 26-cv-02024-RSH-BLM

**RESPONSE TO PETITION**

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20 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject to  
21 mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S. 281  
22 (2018). However, the government acknowledges that courts in this District have repeatedly  
23 inferred a constitutional right against prolonged mandatory detention. Taking into  
24 consideration those prior rulings and the length of time Petitioner has been in custody, the  
25 government concedes that this Court should order that Petitioner receive a bond hearing,  
26 where the government would bear the burden of proof of establishing, by clear and  
27 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.  
28 *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12,

1 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26,  
2 2025).

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DATED: April 7, 2026

ADAM GORDON  
United States Attorney

*s/ Mary Cile Glover-Rogers*  
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