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10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA
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13 ARIA TADAYYONI MOGHADDAM,

14 Petitioner,

15 v.

16 CHRISTOPHER LAROSE, Senior
17 Warden, Otay Mesa Detention Center;
18 *et al.*,

19 Respondents.
20

Case No.: 26-cv-02018-BAS-MSB

AMENDED RESPONSE TO
PETITION

21 Respondents herein respectfully submit this amended response to Petitioner's habeas
22 petition. Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b). *See*
23 *Jennings v. Rodriguez*, 583 U.S. 281 (2018). However, the government acknowledges that
24 courts in this District have repeatedly inferred a constitutional right against prolonged
25 mandatory detention. Taking into consideration those prior rulings and the length of time
26 Petitioner has been in custody, the government does not oppose this Court ordering that
27 Petitioner receive an individualized bond hearing before an immigration judge. *See Sadeqi*
28

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

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DATED: April 22, 2026

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s/ Camille Savedra

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