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9 UNITED STATES DISTRICT COURT

10 SOUTHERN DISTRICT OF CALIFORNIA

11 PAUL MAWULI GADRI,

12 Petitioner,

13 v.

14 KRISTI NOEM, Secretary of the
15 Department of Homeland Security; *et al.*,

16 Respondents.
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Case No.: 26-cv-02056-CAB-SBC

RESPONSE TO PETITION

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20 Respondents, by and through counsel, hereby respond to the Petition for Writ of
21 Habeas Corpus. Undersigned counsel is unable to ascertain sufficient facts at this time to
22 establish that there is a significant likelihood of removal in the reasonably foreseeable
23 future. *See Zadvydas v. Davis*, 533 U.S. 678 (2001). Respondents therefore acknowledge
24 that Petitioner is entitled to be released from custody subject to conditions of supervision.
25 *See* 8 U.S.C. § 1231(a)(3); 8 C.F.R. § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-
26 BJW, 2026 WL 218936, at *1 (S.D. Cal. Jan. 27, 2026) (“The habeas statute does not
27 empower courts to manage ICE supervision programs.”) (citing 28 U.S.C. § 2241(c)(3));
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1 *Khachikian v. Casey*, No. 25-cv-3737-GPC-JLB, ECF No. 13 (S.D. Cal. Jan. 13, 2026)
2 (“Ultimately, ICE has discretion to impose conditions on release.”).

3 DATED: April 10, 2026

ADAM GORDON
United States Attorney

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5 *s/ Camille Savedra*
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