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7 Attorneys for Respondents

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 YAOBIN ZHANG,
11 Petitioner,
12 v.
13 CHRISTOPHER J. LAROSE, *et al.*,
14 Respondents.
15

Case No.: 26-cv-02068-DMS-DDL

RETURN TO PETITION

Judge: Hon. Dana M. Sabraw

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17 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject
18 to mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S.
19 281 (2018). However, the government acknowledges that courts in this District have
20 repeatedly inferred a constitutional right against prolonged mandatory detention.
21 Taking into consideration those prior rulings and the length of time Petitioner has been
22 in custody, and to conserve party resources, the government concedes that this Court
23 should order that Petitioner receive a bond hearing, where the government would bear
24 the burden of proof of establishing, by clear and convincing evidence, that Petitioner
25 poses a danger to the community or a risk of flight. *See Sadeqi v. LaRose*, No. 25-cv-
26 2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12, 2025); *Gao v. LaRose*, No. 25-
27 cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26, 2025).
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1 DATED: April 9, 2026

Respectfully submitted,

2 ADAM GORDON
3 United States Attorney

4 s/ Juliet M. Keene
5 JULIET M. KEENE
6 Assistant United States Attorney
7 Attorney for Respondents
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