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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 MOSAZIG MEHARI MEDHANI,

12 Petitioner,

13 v.

14 JEREMY CASEY,

15 Respondent.
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Case No.: 26-cv-02090-JLS-AHG

**RESPONSE TO AMENDED
PETITION**

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

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

DATED: May 4, 2026

Respectfully submitted,

ADAM GORDON
United States Attorney

s/ Allie E. Malone
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