

1 ADAM GORDON
United States Attorney
2 LAURA SAMBATARO
Assistant United States Attorney
3 Maryland Bar
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-9613
Facsimile: (619) 546-7751
6 Email: Laura.sambataro@usdoj.gov

7 Attorneys for Respondents

8
9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 MARIO JUAN-TOMAS,

12
13 Petitioner,

14 v.

15 CHRISTOPHER J. LAROSE,
WARDEN OF OTAY MESA
16 DETENTION CENTER; et al.,

17 Respondents.
18

Case No.: 26-cv-02112-LL-DDL

RESPONSE TO PETITION

19
20 Petitioner appears to be a member of the Bond Eligible Class certified in *Maldonado*
21 *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL
22 3288403 (C.D. Cal. Nov. 25, 2025). The Ninth Circuit later stayed application of the Order
23 beyond the Central District of California. However, Respondents acknowledges the prior
24 orders from this District directing bond hearings pursuant to 8 U.S.C. § 1226(a) in similar
25 cases.¹ Respondents therefore do not oppose an order from this Court directing a bond

26
27 ¹ To the extent the Court issues an order directing a bond hearing under 1226(a),
28 considering heavy caseloads and staffing levels, Respondents respectfully request that such
order provide the government 14 days from issuance to hold such bond hearing.

1 hearing be held pursuant to 8 U.S.C. § 1226(a).

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: April 15, 2026

ADAM GORDON
United States Attorney

s/ Laura Sambataro

LAURA SAMBATARO
Assistant United States Attorney