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11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**
13

14 TINGTING HUANG,

15 Petitioner,

16 v.

17 TODD ARCHAMBEAULT,
18 IN HIS OFFICIAL CAPACITY AS FIELD
19 OFFICE DIRECTOR OF THE SAN
20 DIEGO FIELD OFFICE OF U.S.
IMMIGRATION AND CUSTOMS
21 ENFORCEMENT, ENFORCEMENT
AND REMOVAL OPERATIONS; et al.,

22 Respondents.
23

Case No.: 26-cv-02152-AGS-DDL

RESPONSE TO PETITION

24 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject to
25 mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S. 281
26 (2018). However, the government acknowledges that courts in this District have repeatedly
27 inferred a constitutional right against prolonged mandatory detention. Taking into
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1 consideration those prior rulings and the length of time Petitioner has been in custody, the
2 government concedes that this Court should order that Petitioner receive a bond hearing,
3 where the government would bear the burden of proof of establishing, by clear and
4 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.
5 *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12,
6 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26,
7 2025).

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9 DATED: April 13, 2026

ADAM GORDON
United States Attorney

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11 *s/ Camille Savedra*
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