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8 **UNITED STATES DISTRICT COURT**

9 **SOUTHERN DISTRICT OF CALIFORNIA**

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11 MARCOS MARTINEZ TAPIA,

12 Petitioner,

13 v.
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15 PATRICK DIVVER,
FIELD OFFICE DIRECTOR OF
16 ENFORCEMENT AND REMOVAL
OPERATIONS, SAN DIEGO FIELD
17 OFFICE, IMMIGRATION AND
CUSTOMS ENFORCEMENT; et al.,

18 Respondents.
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Case No.: 26-cv-02205-BJC-MSB

RESPONSE TO PETITION

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

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4 DATED: April 22, 2026

ADAM GORDON
United States Attorney

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s/ Camille Savedra

CAMILLE SAVEDRA
Assistant United States Attorneys

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