

1 ADAM GORDON
 United States Attorney
 2 HUNTER V. NORTON
 Washington D.C. Bar No. 1780736
 3 DANIELLE L. BROWN
 Colorado State Bar No. 57814
 4 Special Assistant U.S. Attorney
 Office of the U.S. Attorney
 5 880 Front Street, Room 6293
 San Diego, CA 92101-8893
 6 Telephone: (619) 546-8592/8693
 Facsimile: (619) 546-7751
 7 Email: Hunter.Norton2@usdoj.gov
 Email: Danielle.Brown2@usdoj.gov

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9 Attorneys for Respondent

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

14 KALEAB SIUM ZEWELDI,
 15
 16 Petitioner,
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 18 v.
 19 JEREMY CASEY, *Warden, Imperial*
Regional Detention Facility,
 20
 Respondent.

Case No.: 26-cv-02148-DMS-MMP
**RETURN TO PETITION FOR
 WRIT OF HABEAS CORPUS**

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 22 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject to
 23 mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S. 281
 24 (2018). However, the government acknowledges that courts in this District have repeatedly
 25 inferred a constitutional right against prolonged mandatory detention. Taking into
 26 consideration those prior rulings and the length of time Petitioner has been in custody, the
 27 government concedes that this Court should order that Petitioner receive a bond hearing,
 28 where the government would bear the burden of proof of establishing, by clear and

1 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.
2 *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12,
3 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26,
4 2025).

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6 DATED: April 20, 2026

ADAM GORDON
United States Attorney

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9 *s/ Hunter V. Norton*
10 HUNTER V. NORTON
Assistant United States Attorney

11 *s/ Danielle L. Brown*
12 DANIELLE L. BROWN
13 Special Assistant United States Attorney

14 Attorneys for Respondent
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