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10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA
12

13 REZA JULYSARAVI,

14 Petitioner,

15 v.

16 CHRISTOPHER LAROSE, Warden, Otay
17 Mesa Detention Center; et al.,

18 Respondents.
19

Case No.: 26-cv-02251-RSH-BJW

RESPONSE TO PETITION

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

1 *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12,
2 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26,
3 2025).

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5 DATED: April 20, 2026

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