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9 UNITED STATES DISTRICT COURT  
10 SOUTHERN DISTRICT OF CALIFORNIA

11 LEONEL AMILCAR GOMEZ-  
12 CABRERA,

13 Petitioner,  
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15 v.

16 JEREMY CASEY, et al.,

17 Respondents.  
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Case No.: 26-cv-2330-BTM-DEB

**RESPONSE TO AMENDED  
PETITION**

1 Respondents herein respectfully submit this response to Petitioner's amended  
2 petition. Petitioner is subject to a reinstated order of removal, mandatorily detained under  
3 8 U.S.C. § 1231(a), and currently in withholding-only proceedings. *See Johnson v.*  
4 *Arteaga-Martinez*, 596 U.S. 573, 575-76 (2002); *Johnson v. Guzman Chavez*, 594 U.S.  
5 523 (2021); *Hilario M.R. v. Warden*, No. 24-cv-00998-EPG-HC, 2025 WL 1158841  
6 (E.D. Cal. Apr. 21, 2025). Given the length of detention, the government does not oppose  
7 this Court ordering that Petitioner receive an individualized bond hearing before an  
8 immigration judge.<sup>1</sup>

9  
10 DATED: May 7, 2026

ADAM GORDON  
United States Attorney

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13 Assistant United States Attorney  
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27 <sup>1</sup> Petitioner has appealed the denial of bond to the BIA. He has also petitioned for relief from the BIA  
28 denial of withholding of removal to the Ninth Circuit. Both appeals are still pending.