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9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA
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12 LEONEL AMILCAR GOMEZ-
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 SECOND
AMENDED PETITION**

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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.¹

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10 DATED: July 7, 2026

ADAM GORDON
United States Attorney

11 s/Michael D. Wallace
12 MICHAEL D. WALLACE
13 Assistant United States Attorney
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27 ¹ Petitioner has petitioned for relief from the IJ's denial of withholding of removal, and BIA dismissal
28 of his appeal, to the Ninth Circuit which has issued a stay on removal.