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7 Attorneys for Respondents

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 EDMOND LOUIS,
11 Petitioner,
12 v.
13 CHRISTOPHER J. LaROSE, Senior Warden
14 of Otay Mesa Detention Center, et al.,
15 Respondent.

Case No.: 26-cv-02450-CAB-BLM
**RETURN TO PETITION FOR
WRIT OF HABEAS CORPUS**

17 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. The government
18 has carefully reviewed this petition and determined that the legal issues presented
19 concern the statutory authority for U.S. Immigration and Customs Enforcement's (ICE)
20 detention of Petitioner under 8 U.S.C. §§ 1225(b)(2)(A) or 1226(a). While reserving all
21 rights, including the right to appeal, the government respectfully submits this
22 abbreviated response to preserve the legal issues, to conserve judicial and party
23 resources, and to expedite the Court's consideration of this matter.

24 Petitioner was previously released from immigration custody on parole issued
25 under 8 U.S.C. § 1182(d)(5). Respondents have insufficient information regarding
26 termination of that parole, pursuant to 8 C.F.R. § 212.5(e)(2), to provide to the Court.
27 It is the government's position that Petitioner is subject to mandatory detention under
28 § 1225(b)(2). However, the government acknowledges that this Court, and Courts in

1 this District, have repeatedly reached the opposite conclusion under the same and/or
2 similar facts. *See, e.g., Arias Torres v. Bondi*, No. 25-cv-2457-BAS-MSB, 2025 WL
3 3214773 (S.D. Cal. Nov. 18, 2025); *Martinez Lopez v. LaRose*, No. 25-cv-2717-JES-
4 AHG, 2025 WL 3030457 (S.D. Cal. Oct. 30, 2025); *Beltran v. Noem*, No. 25cv2650-
5 LL-DEB, 2025 WL 3078837 (S.D. Cal. Nov. 4, 2025); *Garcia v. Noem*, 803 F. Supp.
6 3d 1064 (S.D. Cal. 2025); *Esquivel-Ipina v. LaRose*, No. 25-CV-2672 JLS (BLM), 2025
7 WL 2998361 (S.D. Cal. Oct. 24, 2025); *Lucas-Miguel v. LaRose*, No. 25-cv-3022-RSH-
8 JLB, 2025 WL 3251580 (S.D. Cal. Nov. 21, 2025); *Vasquez-Diaz v. LaRose*, No. 25-
9 cv-3038-TWR-JLB, ECF No. 6 (S.D. Cal. Nov. 13, 2025); *Cardoso v. LaRose*, No. 25-
10 cv-3043-BJC-VET, ECF No. 7 (S.D. Cal. Dec. 12, 2025); *Maceda-Garcia v. Noem*, No.
11 25-cv-2968-JO-JLB, ECF No. 9 (S.D. Cal. Nov. 13, 2025); *A.S. v. LaRose*, No. 25-cv-
12 2876-RBM-VET, ECF No. 9 (S.D. Cal. Nov. 19, 225); *Prieto-Cordova v. LaRose*, No.
13 25-cv-2824-CAB-DDL, 2025 WL 3228953 (S.D. Cal. Nov. 19, 2025); *Lagarda-Vega*
14 *v. Noem*, No. 25-cv-2970-GPC-DDL, 2025 WL 3558931 (S.D. Cal. Dec. 11, 2025);
15 *Nayyer v. LaRose*, No. 25-cv-3111-AGS-DDL, ECF No. 7 (S.D. Cal. Dec. 12, 2025);
16 *Amaya v. Noem*, No. 25cv2892-BTM-DEB, 2025 WL 3182998 (S.D. Cal. Nov. 13,
17 2025).

18 The government acknowledges that this Court's prior decisions will control the
19 result here if the Court adheres to its prior decisions, as the facts are not materially
20 distinguishable for purposes of the Court's decision, and on that basis the government
21 does not oppose the petition and defers to the Court on the appropriate relief.¹

22 DATED: April 24, 2026

Respectfully submitted,

23 ADAM GORDON
24 United States Attorney

25 *s/ Hunter V. Norton*
26 HUNTER V. NORTON
Assistant United States Attorney

27
28 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.