



1 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.<sup>1</sup>  
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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ADAM GORDON  
United States Attorney

9  
10 *s/Danielle L. Brown*  
11 DANIELLE L. BROWN  
12 Special Assistant United States Attorney

13 Attorneys for Respondents  
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26 <sup>1</sup> Respondents request that the Court note Petitioner presents insufficient evidence that all  
27 Immigration Judges' neutrality has been compromised such that immediate release or additional  
28 safeguards are necessary. *See, e.g., Gutierrez-Valtierra v. Bondi*, No. 26-cv-01343-BAS-VET, 2026  
WL 810066 (S.D. Cal. Mar. 24, 2026).