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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

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12 Z.G.,
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14 Petitioner,
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16 v.
17 CHRISTOPHER LAROSE, et al.,
18
19 Respondents.

Case No.: 26-cv-2487-RSH-AHG
RESPONSE TO PETITION

20 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject
21 to mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S.
22 281 (2018).

23 However, the government acknowledges that courts in this District have
24 repeatedly inferred a constitutional right against prolonged mandatory detention. Taking
25 into consideration those prior rulings, the current progress of the removal proceedings,
26 the cause of delay in the proceedings, and the length of time Petitioner has been in
27 custody, the government concedes that this Court should order that Petitioner receive a
28 bond hearing, where the government would bear the burden of proof of establishing, by

1 clear and convincing evidence, that Petitioner poses a danger to the community or a risk
2 of flight. *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D.
3 Cal. Nov. 12, 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633
4 (S.D. Cal. Sept. 26, 2025).¹

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6 DATED: April 24, 2026

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United States Attorney

s/Michael D. Wallace
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27 _____
28 ¹ Petitioner has an appeal pending at the BIA. The delay in the removal proceedings has been primarily due to the inability to locate an interpreter for Kambaata.