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6 **UNITED STATES DISTRICT COURT**
7 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**
8

9 Z.G.,
10 Petitioner-Plaintiff,
v.
11 Christopher LAROSE, Warden, Otay Mesa
12 Detention Center;
13 Gregory J. ARCHAMBEAULT, Acting Field
Office Director of San Diego Office of Detention
14 and Removal, U.S. Immigrations and Customs
Enforcement; U.S. Department of Homeland
15 Security;
16 Todd M. LYONS, Acting Director, Immigration
17 and Customs Enforcement, U.S. Department of
Homeland Security;
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19 Markwayne MULLIN, in his Official Capacity,
Secretary, U.S. Department of Homeland
20 Security; and
21 Todd BLANCHE, in his Official Capacity,
22 Acting Attorney General of the United States;
23
24 Defendants-Respondents

Case No. 3:26-cv-02487-RSH-AHG

**PETITIONER'S REPLY TO
RESPONDENTS' RESPONSE
TO PETITION**

PETITIONER’S REPLY TO RESPONDENTS’ RESPONSE TO PETITION

1 The Petitioner, through undersigned counsel, respectfully replies to the Respondents’
2 response to the Petitioner’s petition for writ of habeas corpus pursuant to 28 U.S.C. § 2241. In
3 their response, the government “concedes that this Court should order that Petitioner receive a
4 bond hearing, where the government would bear the burden of proof of establishing, by clear and
5 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.” ECF 7
6 at 1-2. The Petitioner concurs with the Respondents on this point, and files the instant reply to
7 expedite the submission of this case to the Court for a decision on the petition.
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9 Dated: April 24, 2026

Respectfully Submitted

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11 /s/ Warren Craig

Warren Craig

12 Attorney for Mr. G
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