

JENNA K. GILBERT (CA SBN 275412)
JGilbert@mofo.com

MORRISON & FOERSTER LLP
717 Wilshire Boulevard, Suite 6000
Los Angeles, California 90017-3543
Telephone: (213) 892-5200
Facsimile: (213) 892-5454

DAVID DOYLE (CA SBN 70690)
774 Armada Terrace
San Diego, California 92106
Telephone: (858) 405-4053

BRIAN M. KRAMER (CA SBN 212107)
BMKramer@mofo.com
MORRISON & FOERSTER LLP
12531 High Bluff Drive, Suite 200
San Diego, California 92130-3588
Telephone: (858) 720-5100
Facsimile: (858) 720-5125

Attorneys for Petitioner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

M.K.,

Petitioner,

v.

SIXTO MARRERO, Warden of the
Imperial Regional Detention Facility;
PETER E. DIVVER JR., Field Office
Director, San Diego Field Office, U.S.
Immigration and Customs Enforcement;
TODD M. LYONS, Acting Director,
U.S. Immigration and Customs
Enforcement; TODD BLANCHE,
Acting Attorney General;
MARKWAYNE MULLIN, Secretary,
Department of Homeland Security, in
their official capacities,

Respondents.

Case No. 3:26-cv-2499-RBM-MMP

**NOTICE OF PETITIONER'S
MOTION TO ENFORCE
JUDGMENT**

Hearing Date: August 3, 2026
Judge: Hon. Ruth Bermudez
Montenegro
Courtroom: 5B

**NO ORAL ARGUMENT UNLESS
ORDERED BY THE COURT**

1 Petitioner M.K. ("Petitioner") respectfully brings this motion to enforce
2 judgment. Good cause exists to grant this motion based on Respondents' failure to
3 provide Petitioner with a legally and constitutionally adequate bond hearing in
4 accordance with this Court's May 7 order. (ECF No. 7.)

5 This motion is supported by the attached Memorandum of Points and
6 Authorities and a proposed order.

7
8 Dated: June 25, 2026

MORRISON & FOERSTER LLP

9
10 /s/ Brian M. Kramer
BRIAN M. KRAMER

11 *Attorney for Petitioner*
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28