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10 UNITED STATES DISTRICT COURT
11
12 SOUTHERN DISTRICT OF CALIFORNIA

13 DOUGLAS NELSON HERRERA
14 GUILLEN,

15 Petitioner,

16 v.

17 FERETI SEMAIA, et al.,

18 Respondents.
19

Case No.: 3:26-cv-02509-DMS-VET

20 RESPONSE TO PETITION

21 Based upon the allegations set forth in the Petition¹, Petitioner appears to be a
22 member of the Bond Eligible Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-
23 CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025).
24 The Ninth Circuit later stayed application of the Order beyond the Central District of
25 California. However, Respondents acknowledges prior orders from this District directing
26 bond hearings pursuant to 8 U.S.C. § 1226(a) in similar cases. *See, e.g., Trujillo v. Noem*,

27 ¹ The Petition identifies Fereti Semaia as the “Warden of the Imperial Regional
28 Adult Detention Facility.” ECF 1, ¶ 18. The facility administrator is Jeremy Casey.

1 No. 26-cv-00268-BAS-VET, 2026 WL 266496, at *2 (S.D. Cal. February 2, 2026).
2 Respondents therefore do not oppose an order from this Court directing a bond hearing be
3 held pursuant to 8 U.S.C. § 1226(a).²

4 DATED: May 4, 2026
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6 Respectfully submitted,

7 ADAM GORDON
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9 s/ Roger G. Wright
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26 _____
27 ² To the extent the Court issues an order directing a bond hearing under 1226(a),
28 considering heavy caseloads and staffing levels, Respondents respectfully request that
such order provide the government 14 days from issuance to hold such bond hearing.