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9 Attorneys for Respondents

10 **UNITED STATES DISTRICT COURT**
11
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 SIMONA MATEO CRISTBAL,

14 Petitioner,

15 v.

16 TODD BLANCHE, *et al.*,

17 Respondents.
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Case No.: 3:26-cv-02522-RBM-VET

**RETURN TO PETITION FOR A
WRIT OF HABEAS CORPUS**

20 Based upon the allegations set forth in the Petition, Petitioner appears to be a member
21 of the Bond Eligible Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-
22 01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). The
23 Ninth Circuit later stayed application of the Order beyond the Central District of California.
24 However, Respondents acknowledges prior orders from this District directing bond
25 hearings pursuant to 8 U.S.C. § 1226(a) in similar cases.¹ *See, e.g., Trujillo v. Noem*, No.
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28 ¹ To the extent the Court issues an order directing a bond hearing under 1226(a),
considering heavy caseloads and staffing levels, Respondents respectfully request that such

1 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). Respondents further state in accordance with the
4 directive set forth in the Court's Order to Show Cause entered on 21 April 2026 (ECF 2)
5 that an evidentiary hearing is not requested.

6
7 DATED: April 28, 2026

8
9 Respectfully submitted,

10 ADAM GORDON
11 United States Attorney

12 s/ Roger G. Wright
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14 Special Assistant U.S. Attorney
15 Michael D. Wallace
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17 Attorneys for Respondents

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order provide the government 14 days from issuance to hold such bond hearing.