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

13 WILLI GALINDO MORALES  
14 HERNANDEZ,

15 Petitioner,

16 v.

17 THOMAS GILES, *et al.*,

18 Respondents.  
19

Case No.: 3:26-cv-02543-AGS-DDL

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

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21 Based upon the allegations set forth in the Petition, 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 No. 26-cv-00268-BAS-VET, 2026 WL 266496, at \*2 (S.D. Cal. February 2, 2026).  
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1 Respondents therefore do not oppose an order from this Court directing a bond hearing<sup>1</sup> be  
2 held pursuant to 8 U.S.C. § 1226(a).<sup>2</sup>

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4 DATED: April 30, 2026

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Respectfully submitted,

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ADAM GORDON  
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*s/ Roger G. Wright*  
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<sup>1</sup> It is noted that Exhibit D at “Part 7, Question 54” (ECF 1-2) to the Petition (ECF 1) at Page ID 70 lists two (2) prior convictions from 2025 and 2019, respectively. Given this information, Respondents respectfully submit, should the Court determine relief is warranted, that a bond hearing under 1226(a) (as opposed to Petitioner’s primary requested relief of release as requested in ECF 1 at Page ID 7) would be appropriate.

<sup>2</sup> 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 order provide the government 14 days from issuance to hold such bond hearing.