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11 **UNITED STATES DISTRICT COURT**

12 **SOUTHERN DISTRICT OF CALIFORNIA**

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14 SAKIROU BOUKOUBONGUE,

15 Petitioner,

16 v.

17 JEREMY CASEY, *Warden, Imperial*  
18 *Regional Detention Facility,*

19  
20 Respondent.

Case No.: 26-cv-02491-JO-VET

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

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22 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject to  
23 mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S. 281  
24 (2018). However, the government acknowledges that courts in this District have repeatedly  
25 inferred a constitutional right against prolonged mandatory detention. Taking into  
26 consideration those prior rulings and the length of time Petitioner has been in custody, the  
27 government concedes that this Court should order that Petitioner receive a bond hearing,  
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1 where the government would bear the burden of proof of establishing, by clear and  
2 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.  
3 *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12,  
4 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26,  
5 2025).

6  
7 DATED: April 29, 2026

ADAM GORDON  
United States Attorney

8  
9 *s/ Danielle L. Brown*  
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