

1 Alejandro Monsalve
2 CA SBN 324958
3 Alex Monsalve Law Firm, PC
4 240 Woodlawn Ave., Suite 9
5 Chula Vista, CA 91910
6 (619) 777-6796
7 Counsel for Petitioner

8
9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 **KHALIL SHAHIN,**

12 Petitioner

13 v.

14 **CHRISTOPHER J. LAROSE, et al.,**

15 Respondents

Case No.: 26-cv-02591-AGS-MSB

**PETITIONER'S REPLY TO
RESPONDENT'S RETURN**

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17 Petitioner respectfully submits this reply to Respondents' Return.

18 Respondents concede that Petitioner is entitled to a bond hearing at which the
19 government bears the burden of proof by clear and convincing evidence. This concession
20 resolves the central issue presented in the Petition and confirms that Petitioner's continued
21 detention without such a hearing is unlawful. Respondents do not attempt to justify Petitioner's
22 detention absent this constitutionally required process.

23 Because Respondents do not defend the legality of Petitioner's continued detention, no
24 material factual or legal dispute remains for adjudication. The Petition may be resolved on the
25 papers, and judicial economy favors prompt resolution.

26 Accordingly, Petitioner respectfully requests that the Court grant the Petition and order
27 Respondents to provide a prompt bond hearing within a timeframe set by the Court, at which the
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1 government must bear the burden of establishing, by clear and convincing evidence, that
2 continued detention is necessary to prevent flight or danger to the community.

3 Respectfully submitted,

4 /s/ Alejandro J. Monsalve, Esq. CA SBN 324958

5 Alex Monsalve Law Firm, PC

6 240 Woodlawn Ave, Suite 9

7 Chula Vista, CA 91910

8 Phone: (619) 777-6796

9 Email: info@alexmonsalvelawfirm.com

10 Counsel for Petitioner

11 Dated: April 30, 2026