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10 UNITED STATES DISTRICT COURT
11
12 SOUTHERN DISTRICT OF CALIFORNIA

13 YORDANI TELLEZ TORRES,

14 Petitioner,

15 v.

16 JEREMY CASEY, *et al.*,

17 Respondents.
18
19

Case No.: 3:26-cv-02650-DMS-VET

RESPONSE TO PETITION

20
21 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject
22 to mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S.
23 281 (2018). However, the government acknowledges that courts in this District have
24 repeatedly inferred a constitutional right against prolonged mandatory detention. Taking
25 into consideration those prior rulings and the length of time Petitioner has been in
26 custody, the government concedes that this Court should order that Petitioner receive an
27 individualized bond hearing, where the government would bear the burden of proof of
28 establishing, by clear and convincing evidence, that Petitioner poses a danger to the

community or a risk of flight. *See Sadeqi v. LaRose*, 809 F.Supp.3d 1090 (S.D. Cal. 2025); *Gao v. LaRose*, 805 F.Supp.3d 1106 (S.D. Cal. 2025).

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Respectfully submitted,

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s/ Roger G. Wright
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