

1 ADAM GORDON
United States Attorney
2 MICHAEL D. WALLACE
Assistant U.S. Attorney
3 Maryland State Bar No. 9912160256
ROGER G. WRIGHT
4 Special Assistant United States Attorney
Kentucky Bar Association No. 84791
5 Office of the U.S. Attorney
880 Front Street, Room 6293
6 San Diego, CA 92101-8893
Telephone: 619-546-8895
7 Email: roger.wright@usdoj.gov

8 Attorneys for Respondents

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

12 HAMOOD ABDIKADIR MOHAMED,

13 Petitioner,

14 v.

15 WARDEN JEREMY CASEY, *et al*,

16 Respondents.
17

Case No.: 3:26-cv-02612-JLS-BJW

RESPONSE TO PETITION

18
19 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. It is the position of
20 Respondents that Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b).
21 *See Jennings v. Rodriguez*, 583 U.S. 281 (2018). However, the government acknowledges
22 that courts in this District have repeatedly inferred a constitutional right against prolonged
23 mandatory detention. Taking into consideration those prior rulings and the length of time
24 Petitioner has been in custody, the government concedes that this Court should order that
25 Petitioner receive an individualized bond hearing, where the government would bear the
26 burden of proof of establishing, by clear and convincing evidence, that Petitioner poses a
27 danger to the community or a risk of flight. *See Sadeqi v. LaRose*, 809 F.Supp.3d 1090
28

1 (S.D. Cal. 2025); *Gao v. LaRose*, 805 F.Supp.3d 1106 (S.D. Cal. 2025).

2
3 DATED: May 28, 2026

ADAM GORDON
United States Attorney

4 *s/ Roger G. Wright*
5 Roger G. Wright
6 Special Assistant United States Attorney
7 Michael D. Wallace
8 Assistant United States Attorney
9 Attorneys For Respondents
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28