

1 ADAM GORDON
United States Attorney
2 DANIELLE L. BROWN
Special Assistant United States Attorney
3 Colorado State Bar No. 57814
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-8592
Email: Danielle.Brown2@usdoj.gov
6

7 Attorneys for Respondents

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

11 ADOLFO GONZALEZ,

12
13 Petitioner,

14 v.

15 PATRICK DIVVER, *Field Office*
16 *Director of Enforcement and Removal*
17 *Operations, Immigration and Customs*
18 *Enforcement, et al.,*
19

20 Respondents.
21
22
23
24
25
26
27
28

Case No. 26-cv-02788-JO-GC

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

1 Petitioner appears to be a member of the Bond Eligible Class certified in *Maldonado*
2 *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL
3 3288403 (C.D. Cal. Nov. 25, 2025). The Ninth Circuit later stayed application of the Order
4 beyond the Central District of California. However, Respondents acknowledges the prior
5 orders from this District directing bond hearings pursuant to 8 U.S.C. § 1226(a) in similar
6 cases.¹

7 Respondents therefore do not oppose an order from this Court directing a bond
8 hearing be held pursuant to 8 U.S.C. § 1226(a).

9
10 DATED: May 7, 2026

ADAM GORDON
United States Attorney

11
12
13 s/Danielle L. Brown
DANIELLE L. BROWN
Special Assistant United States Attorney

14
15 Attorneys for Respondents
16
17
18
19
20
21
22
23
24
25

26
27 ¹ To the extent the Court issues an order directing a bond hearing under 1226(a),
28 considering heavy caseloads and staffing levels, Respondents respectfully request that such
order provide the government 14 days from issuance to hold such bond hearing.