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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**
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12 ZHANG MING QING,

13
14 Petitioner,

15 v.

16 JEREMY CASEY, et al.,

17
18 Respondents.
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Case No. 26-cv-02920-JO-DEB

**SUPPLEMENTAL BRIEFING RE:
ORDER ECF NO. 5**

20 On June 2, 2026, the Court issued an order directing “Respondents to file
21 supplemental briefing by June 9, 2026 identifying and addressing
22 any individualized concerns regarding Petitioner's danger to the community or flight
23 risk, including the factual basis for any such concerns.” ECF No. 5. Respondents
24 provide the following information pursuant to the Court’s June 2, 2026 order.

25 Petitioner was detained for unlawful entry when she entered the United States
26 using a smuggler. *See* ECF No. 4-1, Exhibit 1 (I-213). Petitioner has limited connections
27 to the United States. *Id.* There is no information presented that Petitioner has any
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1 potential professional connections inside the United States. *Id.* Petitioner is in removal
2 proceedings under 8 U.S.C. § 1229a. *Id.*

3 Respondents' position is that this Court should order that Petitioner receive a
4 bond hearing before an immigration judge, where the Department of Homeland Security
5 (DHS) would bear the burden of proof establishing, by clear and convincing evidence,
6 that Petitioner poses a danger to the community or a risk of flight.

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8 Dated: June 9, 2026

Respectfully submitted,

9 ADAM GORDON
10 United States Attorney

11 s/ Jacob T. Metzger
12 JACOB T. METZGER
13 Special Assistant U.S. Attorney
14 Attorney for Respondents
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