

1 ADAM GORDON
United States Attorney
2 MICHAEL D. WALLACE
Assistant United States Attorney
3 Maryland Bar No. 9912160256
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-8714
Email: Michael.Wallace4@usdoj.gov

6 Attorneys for Respondents
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9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 HONGDA ZHANG,

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13 Petitioner,

14 v.

15 CHRISTOPHER J. LAROSE, et al.,

16 Respondents.
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Case No.: 26-cv-3107-RFL-JAC

RESPONSE TO PETITION

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20 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject
21 to mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S.
22 281 (2018).

23 Taking into consideration the current progress of the removal proceedings,
24 Petitioner's status as a visa overstay prior to his entry into Mexico and attempted re-
25 entry into the United States, which would have entitled Petitioner to a bond hearing under
26 8 U.S.C. §1226(a), and the prior rulings of this District Court under similar factual
27 circumstances, the government concedes that this Court should order that Petitioner
28 receive a bond hearing, where the Petitioner would bear the burden of proof of

1 establishing, by clear and convincing evidence, that Petitioner does not pose a danger to
2 the community or a risk of flight. 8 C.F.R. 1003.19(h)(3).

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4 DATED: May 26, 2026

ADAM GORDON
United States Attorney

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6 s/Michael D. Wallace
MICHAEL D. WALLACE
Assistant United States Attorney
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