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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

MARIA LUISA SANCHEZ HILDALGO,

Petitioner,

v.

TODD BLANCHE; et al.,

Respondents.

Case No. 26-cv-3363-RSH-GC

RESPONSE TO PETITION

Petitioner appears to be a member of the Bond Eligible Class certified in *Maldonado Bautista v. Santacruz*, 813 F. Supp. 3d 1084 (C.D. Cal. 2025). The Ninth Circuit has stayed application of the Order beyond the Central District of California. However, Respondents acknowledge the prior orders from this District directing bond hearings pursuant to 8 U.S.C. § 1226(a) in similar cases.¹ Respondents therefore do not

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

1 oppose an order from this Court directing a bond hearing be held pursuant to 8 U.S.C.
2 § 1226(a).²

3 To the extent Petitioner asserts claims under the Fourth Amendment, she fails to
4 explain why release is the remedy for such alleged violations. *United States v. Crews*,
5 445 U.S. 463, 474 (1980) (noting, in the criminal context, that Fourth Amendment's
6 "exclusionary principle" "delimits what proof the Government may offer against the
7 accused at trial, closing the courtroom door to evidence secured by official
8 lawlessness," but an individual "is not himself a suppressible 'fruit'"); *Cruz v. Barr*,
9 926 F.3d 1128, 1146 (9th Cir. 2019) (releasing petitioner on Fourth Amendment
10 grounds because fruits of the regulatory violation were the only evidence of petitioner's
11 alienage).

12 Dated: June 5, 2026

Respectfully submitted,

13 ADAM GORDON
14 United States Attorney

15 s/ Erin Dimbleby
16 ERIN DIMBLEBY
17 Assistant United States Attorney
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25 _____
26 ² The Ninth Circuit has confirmed that at a bond hearing under 8 U.S.C. § 1226(a), the
27 burden is on the detainee to demonstrate by a preponderance of the evidence that he is
28 not a flight risk or danger to the community. *See Rodriguez Diaz v. Garland*, 53 F.4th
1189, 1197 (9th Cir. 2022); *see also Dos Santos v. Becerra*, No. 26-cv-01423-GPC-
VET, 2026 WL 800201 (S.D. Cal. Mar. 23, 2026).