

1 ADAM GORDON
United States Attorney
2 JACOB T. METZGER
Special Assistant U.S. Attorney
3 Ohio State Bar No. 104783
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-8693
Mobile: (619) 885-2119
6 Facsimile: (619) 546-7751
Email: jacob.metzger@usdoj.gov

7 Attorneys for Respondents
8

9
10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

12 MAYRA ILIANA AMBROCIO CORTES,

13 Petitioner,
14

15 v.

16 TODD BLANCHE, *et al.*,

17 Respondents.
18

Case No.: 26-cv-03414-DMS-DDL

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

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

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

2
3 DATED: June 15, 2026

Respectfully submitted,

4 ADAM GORDON
5 United States Attorney

6 s/ Jacob T. Metzger
7 JACOB T. METZGER
8 Special Assistant U.S. Attorney
9 Attorney for Respondents
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

25 ² The Ninth Circuit has confirmed that at a bond hearing under 8 U.S.C. § 1226(a), the
26 burden is on the detainee to demonstrate by a preponderance of the evidence that he is
27 not a flight risk or danger to the community. *See Rodriguez Diaz v. Garland*, 53 F.4th
28 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).