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Attorney for:

ROMULA HERNANDEZ RUBIO

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

ROMULA HERNANDEZ RUBIO

Petitioner,

vs.

WARDEN OF THE GOLDEN STATE

ANNEX DETENTION FACILITY, et al.,

Respondent

) Case No.: 1:26-cv-05090-TLN-AC

)

) **REPLY TO RESPONDENT'S**

) **OPPOSITION TO PETITIONER'S WRIT**

) **OF HABEAS CORPUS**

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ROMULA HERNANDEZ RUBIO (hereinafter "HERNANDEZ RUBIO"), by and

through his attorney of record, TIMOTHY PATRICK HENNESSY, hereby submits this Reply to

Respondent's response to motion.

I.

INTRODUCTION

Mr. HERNANDEZ RUBIO was arrested on April 28, 2026. He filed his Petition for Writ of Habeas Corpus on July 2, 2026. Defense counsel was assigned to Mr. HERNANDEZ RUBIO on July 17, 2026. The Honorable District Court Judge Troy L. Nunley has ordered that Mr.

ROMULA HERNANDEZ RUBIO REPLY TO RESPONDENT'S OPPOSITION

1 HERNANDEZ RUBIO shall file a response to Respondent's opposition.

2 **II. ARGUMENT**

3 Mr. HERNANDEZ RUBIO submits on the previously made arguments laid out in his
4 petition (Dkt. No. 1).

5 **III. CONCLUSION**

6 Mr. HERNANDEZ RUBIO requests this court to immediately release him on monitoring
7 with his personal effects or, in the alternative, grant him a bond hearing in front of an
8 immigration judge with the burden being placed on the government to prove by clear and
9 convincing evidence that he is a flight risk or a danger to the community.

10 DATED: July 24, 2026

11 /s/ Timothy Hennessy

12 TIMOTHY HENNESSY
13 Attorney for Petitioner
14 ROMULA HERNANDEZ RUBIO
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