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Attorneys for *Petitioner*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ANGEL EFRAIN PUCHA-MALDONADO,	:	Case No.: 26-cv-03949-BJC-SBC
	:	
Petitioner,	:	TRAVERSE
	:	
<i>Petitioner,</i>	:	
	:	
v.	:	
	:	
TODD BLANCHE, Acting Attorney General	:	
of the United States of America <i>et al.</i>	:	
	:	
<i>Respondents.</i>	:	

Petitioner Angel Efrain Pucha-Maldonado, by and through counsel, respectfully submits this Reply to Respondents' Response to the Petition for Writ of Habeas Corpus filed pursuant to 28 U.S.C. Section 2241.

Petitioner appreciates and accepts Respondents' concession that they do not oppose an order from this Court directing that an individualized bond hearing be held pursuant to 8 U.S.C.

Section 1226(a). Because the parties are in agreement that a bond hearing is the appropriate remedy, the Court should immediately grant the Petition and order the requested relief.

However, Petitioner objects to Respondents' request for a 14-day delay to conduct the hearing. Given Petitioner's ongoing deprivation of liberty, any further delay is unwarranted and highly prejudicial. Petitioner respectfully requests that this Court order Respondents to provide the bond hearing within 7 days of the Court's order.

Furthermore, while the Court need not reach the merits of Petitioner's additional statutory and constitutional claims to grant the immediate relief sought, Petitioner maintains that his prolonged detention without a custody hearing violates both the Administrative Procedure Act and the Due Process Clause of the Fifth Amendment. Should the Court determine that a hearing under 8 U.S.C. Section 1226(a) is not the proper vehicle, these constitutional claims must be addressed.

For the foregoing reasons, Petitioner respectfully requests that this Court grant the Petition for Writ of Habeas Corpus and order Respondents to afford Petitioner an individualized bond hearing before an Immigration Judge within 7 days of the Court's order.

DATED: July 17, 2026

Respectfully submitted,

Maribel J. Allen

Maribel Josefina Allen, Esq.
Attorney for Petitioner