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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 SALVADOR FLORES GONZALEZ,
11

No. 1:26-CV-06150-JLT-EPG

12 **REPLY**

13 Petitioner,

14 v.

15 WARDEN OF THE GOLDEN STATE
ANNEX DETENTION FACILITY ET AL.,

16 Respondents.
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19 Detention in this case was pursuant to 8 U.S.C. § 1225(b)(2)(A), and Respondents
20 respectfully maintain the position that such provision governs here. Respondents
21 acknowledge, however, that *Rodriguez Vazquez v. Bostock*, 2026 WL 2196424 (9th Cir.
22 July 30, 2026), holds that § 1226(a) governs Petitioner's detention. Petitioner is therefore
23 entitled to seek a custody redetermination hearing before an immigration judge.

24 Respondents do not request a hearing or additional briefing on the merits.
25 Respondents do not oppose converting the motion for a temporary restraining order into a
26 motion for a preliminary injunction.
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1 Dated: August 11, 2026

Respectfully submitted,

2 ERIC GRANT

3 United States Attorney

4 By: /s/ Jonathan Williams
JONATHAN WILLIAMS
5 Assistant United States Attorney