Alfonso Morales, State Bar No. 235314
LAW OFFICE OF ALFONSO MORALES, ESQ.
8131 Rosecrans Ave., Ste. 200
Paramount, CA 90723
Telephone: (310) 669-8700

Attorney for Petitioner

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FRISCA INYI RAMIREZ CLAVIJO, *Petitioner*, v. WARDEN OF ADELANTO DETENTION FACILITY, *et al,*. *Respondents.*	Case No. 5:25-cv-03203-RGK-AJR **REPLY TO RESPONDENTS' ANSWER TO HABEAS CORPUS PETITION**

Petitioner Frisca Inyi Ramirez Clavijo ("Petitioner") respectfully submits this Reply in Response to Respondents Return to Petition for Writ of Habeas Corpus.

Petitioner concurs with Respondents that she appears to be a member of the Bond Eligible Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025), and that final judgment has been entered as to the Bond Eligible Class. *Bautista*, ECF No. 945

Accordingly, Petitioner respectfully requests that this Court issue an order directing that an individualized bond hearing be held within seven (7) days pursuant to

8 U.S.C. § 1226(a). Petitioner is prepared to meet the applicable burden at that hearing and demonstrate that she is neither a danger to the community nor a flight risk.

Dated: January 15, 2026

Respectfully submitted,

/s/ Alfonso Morales
Alfonso Morales, Esq.
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which constitutes service on all parties or counsel by electronic means as reflected on the Notice of Electronic Filing.

/s/Alfonso Morales
Alfonso Morales, Esq.
Attorney for Petitioner