

PONCE LAW CORP
ROGER H. PONCE (SBN 271243)
1424 17TH STREET
BAKERSFIELD, CA 93301
TEL: (661) 888-2003
FAX: (800) 753-9309

Attorneys for Petitioner
RAMIRO TRUJILLO HERNANDEZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

RAMIRO TRUJILLO HERNANDEZ,

Petitioner,

v.

WARDEN OF THE GOLDEN STATE ANNEX
DETENTION FACILITY ET AL,

Respondents.

Case No. 1:25-cv-01711-WBS-SCR

**PETITIONER'S RESPONSE TO
RESPONDENTS' OBJECTIONS TO
FINDINGS AND
RECOMMENDATIONS**

I. INTRODUCTION

The Magistrate Judge correctly concluded that Petitioner's prolonged detention—now approaching ten months—without any individualized bond hearing violates the Due Process Clause and warrants a bond hearing. Respondents' objections do not identify any error in the factual findings or legal analysis. Instead, Respondents simply repeat the same arguments raised in their Return and ask this Court to adopt a minority approach that treats mandatory detention under 8 U.S.C. § 1226(c) as effectively immune from as-applied constitutional review.

That position is inconsistent with Supreme Court precedent, persuasive circuit authority, and the overwhelming weight of district court decisions within this Circuit. The Findings and Recommendations should be adopted.

II. STANDARD OF REVIEW

The Court reviews de novo those portions of the Findings and Recommendations to which objections are made. 28 U.S.C. § 636(b)(1). The Court may accept, reject, or modify the recommended disposition.

III. RESPONDENTS' OBJECTIONS LACK MERIT

Respondents' objections consist of a single argument: that this Court should analyze Petitioner's due process claim under the framework adopted in *Keo v. Warden of the Mesa Verde ICE Processing Center*, rather than the *Mathews v. Eldridge* framework applied by the Magistrate Judge.

That objection fails.

IV. THE MAGISTRATE JUDGE CORRECTLY APPLIED THE MATHEWS FRAMEWORK

The Magistrate Judge correctly held that *Mathews v. Eldridge*, 424 U.S. 319 (1976), provides the appropriate framework for evaluating Petitioner's as-applied procedural due process challenge.

As the Findings and Recommendations explain, the Ninth Circuit has not adopted a categorical rule foreclosing bond hearings under § 1226(c), and has expressly left open whether due process requires such hearings in cases of prolonged detention. See *Martinez v. Clark*, 36 F.4th 1219, 1223 (9th Cir. 2022).

Consistent with that guidance, courts across this Circuit apply *Mathews* to determine whether continued detention without individualized review remains constitutionally permissible. The Magistrate Judge's approach aligns with that well-established practice.

Respondents' reliance on *Keo* does not justify a different result. *Keo* represents one district court's approach and is neither binding nor widely followed. By contrast, the Magistrate Judge's analysis reflects the prevailing approach among district courts and is consistent with persuasive authority from multiple circuits recognizing that prolonged mandatory detention raises due process concerns.

VII. THE MATHEWS FACTORS FAVOR PETITIONER

The Magistrate Judge correctly found that all three *Mathews* factors weigh in Petitioner's favor:

1. Private Interest

Petitioner has a substantial liberty interest in freedom from prolonged detention. Courts consistently recognize this interest as weighty where detention extends for many months without review.

2. Risk of Erroneous Deprivation

The risk is significant where, as here, **no bond hearing has ever occurred**. The absence of any individualized assessment strongly supports additional procedural safeguards.

3. Government Interest

Providing a bond hearing imposes minimal burden and does not undermine the government's interest in immigration enforcement. Immigration Judges routinely conduct such hearings.

Respondents' objections do not meaningfully challenge this analysis.

VIII. THE RECOMMENDED RELIEF IS APPROPRIATE

The Magistrate Judge recommended a narrowly tailored remedy:

- A bond hearing
- Before a neutral adjudicator
- With the government bearing the burden by clear and convincing evidence

This relief respects Congress's statutory framework while ensuring compliance with constitutional requirements.

Respondents offer no persuasive reason to disturb that recommendation.

IX. CONCLUSION

Respondents' objections merely restate arguments already considered and correctly rejected. The Magistrate Judge applied the correct legal framework, properly evaluated the facts, and reached the correct conclusion.

1 For these reasons, Petitioner respectfully requests that the Court:

- 2 1. Adopt the Findings and Recommendations in full;
3 2. Grant the Petition for Writ of Habeas Corpus; and
4 3. Order Respondents to provide Petitioner with a bond hearing consistent with the Findings
5 and Recommendations.

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7 Respectfully submitted,

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9 Date: April 1, 2026

/s/ Roger Humberto Ponce, Jr.

10 ROGER HUMBERTO PONCE, Jr.
11 Attorney for Petitioner
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