

1 ADAM GORDON
United States Attorney
2 JULIET M. KEENE
Assistant U.S. Attorney
3 New Mexico State Bar No. 126365
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-6768
Facsimile: (619) 546-7751
6 Email: juliet.keene@usdoj.gov

7 Attorneys for Respondents

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 JAGROOP SINGH,

11 Petitioner,

12 v.

13 WARDEN, Imperial Regional Adult
Detention Facility, *et al.*,

14 Respondents.
15

Case No.: 26-cv-01355-LL-MMP

RETURN TO PETITION

Judge: Hon. Linda Lopez

16
17 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. The government
18 has carefully reviewed this petition and determined that the legal issues presented
19 concern the statutory authority for U.S. Immigration and Customs Enforcement's (ICE)
20 detention of Petitioner under 8 U.S.C. §§ 1225(b)(2)(A) or 1226(a). While reserving all
21 rights, including the right to appeal, the government respectfully submits this
22 abbreviated response to preserve the legal issues, to conserve judicial and party
23 resources, and to expedite the Court's consideration of this matter.

24 Petitioner was previously released from immigration custody on conditional
25 parole issued under 8 U.S.C. § 1226(a). It is the government's position that Petitioner
26 is subject to mandatory detention under § 1225(b)(2). However, the government
27 acknowledges that this Court, and Courts in this District, have repeatedly reached the
28 opposite conclusion under the same and/or similar facts. *See, e.g., Arias Torres v. Bondi,*

1 No. 25-cv-2457-BAS-MSB, 2025 WL 3214773 (S.D. Cal. Nov. 18, 2025); *Martinez*
 2 *Lopez v. LaRose*, No. 25-cv-2717-JES-AHG, 2025 WL 3030457 (S.D. Cal. Oct. 30,
 3 2025); *Beltran v. Noem*, No. 25cv2650-LL-DEB, 2025 WL 3078837 (S.D. Cal. Nov. 4,
 4 2025); *Garcia v. Noem*, 803 F. Supp. 3d 1064 (S.D. Cal. 2025); *Esquivel-Ipina v.*
 5 *LaRose*, No. 25-CV-2672 JLS (BLM), 2025 WL 2998361 (S.D. Cal. Oct. 24, 2025);
 6 *Lucas-Miguel v. LaRose*, No. 25-cv-3022-RSH-JLB, 2025 WL 3251580 (S.D. Cal.
 7 Nov. 21, 2025); *Vasquez-Diaz v. LaRose*, No. 25-cv-3038-TWR-JLB, ECF No. 6 (S.D.
 8 Cal. Nov. 13, 2025); *Cardoso v. LaRose*, No. 25-cv-3043-BJC-VET, ECF No. 7 (S.D.
 9 Cal. Dec. 12, 2025); *Maceda-Garcia v. Noem*, No. 25-cv-2968-JO-JLB, ECF No. 9
 10 (S.D. Cal. Nov. 13, 2025); *A.S. v. LaRose*, No. 25-cv-2876-RBM-VET, ECF No. 9 (S.D.
 11 Cal. Nov. 19, 225); *Prieto-Cordova v. LaRose*, No. 25-cv-2824-CAB-DDL, 2025 WL
 12 3228953 (S.D. Cal. Nov. 19, 2025); *Lagarda-Vega v. Noem*, No. 25-cv-2970-GPC-
 13 DDL, 2025 WL 3558931 (S.D. Cal. Dec. 11, 2025); *Nayyer v. LaRose*, No. 25-cv-3111-
 14 AGS-DDL, ECF No. 7 (S.D. Cal. Dec. 12, 2025); *Amaya v. Noem*, No. 25cv2892-BTM-
 15 DEB, 2025 WL 3182998 (S.D. Cal. Nov. 13, 2025).

16 The government acknowledges that this Court's prior decisions will control the
 17 result here if the Court adheres to its prior decisions, as the facts are not materially
 18 distinguishable for purposes of the Court's decision, and on that basis the government
 19 does not oppose the petition and defers to the Court on the appropriate relief.¹

20
 21 DATED: April 10, 2026

Respectfully submitted,

22
 23 ADAM GORDON
 24 United States Attorney

25 *s/ Juliet M. Keene*
 26 JULIET M. KEENE
 27 Assistant United States Attorney
 28 Attorney for Respondents

¹ To the extent the Court issues an order directing a bond hearing under 1226(a), considering heavy caseloads and staffing levels, Respondents respectfully request that such order provide the government 14 days from issuance to hold such bond hearing.