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14 **Request for student practice pending*

15 *Counsel for Petitioner*

16 **UNITED STATES DISTRICT COURT**
17 **SOUTHERN DISTRICT OF CALIFORNIA**

18 Jonathan Alexis Bonilla

19 *Petitioner,*

20 v.

21 Christopher J. LAROSE, Warden, Otay
22 Mesa Detention Center; Daniel A
23 BRIGHTMAN, Field Office Director, San
24 Diego Field Office, United States
25 Immigration and Customs Enforcement;
26 Todd M. LYONS, Acting Director, United
27 States Immigration and Customs
28 Enforcement; Markwayne MULLIN,
Secretary of Homeland Security; Todd
Wallace BLANCHE, Acting Attorney
General *in their official capacities,*

Respondents.

Case No.: 26-cv-2247-TWR-BLM

**REPLY RE: NOTICE OF
RELATED CASE PURSUANT
TO LOCAL RULE 40.1**

Petitioner, through undersigned counsel, submits this Reply regarding his Notice of Related Case. Pursuant to the requirements of Local Rule 40.1(f), undersigned counsel were required to “promptly file” a Notice of Related Case because they “ha[ve] reason to believe” this matter is related to *Fanfan v. Noem*, Case No. 25-cv-3291-DMS-BJW (S.D. Cal. filed November 25, 2025).¹ Specifically, both cases assert claims under the Due Process Clause and the Administrative Procedure Act (APA) challenging the re-detention of noncitizens previously released by the Department of Homeland Security (DHS) at their Immigration and Customs Enforcement (ICE) check-ins. Contrary to Respondents’ assertion, this case (like *Fanfan*) does not turn on the statutory authority under which the Government claims to detain Petitioner. ECF 4 at 1-2. Thus, both matters “[a]rise from the same or substantially identical transactions, happenings or events,” “[i]nvolve the same or substantially the same parties,” “[c]all for determination of the same or substantially identical questions of law,” or “[i]nvolve substantial duplication of labor if heard by different judges.” L.R. 40.1(e).

While Petitioner believes this matter is related to *Fanfan* in light of the cases’ overlapping facts, legal claims, and Respondents, his primary interest is in the prompt adjudication of his habeas petition regardless of judge assignment. Petitioner respectfully requests that the Court adjudicate this Notice so that the case may swiftly proceed on the merits.

Date: April 15, 2026

Respectfully Submitted,

/s/ Talia Inlender

Talia Inlender

Sofía López Franco

¹ Undersigned counsel Talia Inlender and Sofía López Franco are also counsel for Plaintiffs-Petitioners in the *Fanfan* matter.

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Jessica Rich, Law Student Representative*

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COUNSEL FOR PETITIONER