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

ALASTIA ACHA,

Petitioner

v.

CHRISTOPHER J. LAROSE, et al.,

Respondents

Case No.: 26-cv-02532-AGS-JLB

**PETITIONER'S REPLY TO
RESPONDENT'S RETURN**

Petitioner respectfully submits this reply to Respondents' Return.

Respondents concede that Petitioner is entitled to a bond hearing at which the government bears the burden of proof by clear and convincing evidence. This concession resolves the core issue presented in the Petition. Respondents do not defend the legality of Petitioner's continued detention absent such a hearing.

Because Respondents do not oppose the relief sought, no material factual or legal dispute remains for adjudication. The only issue is the form and timing of the Court's order.

The Court previously set a hearing on the petition for May 11, 2026. In light of Respondents' concession, that hearing is no longer necessary. The matter may be resolved on the papers, and judicial economy favors vacating the hearing and issuing an order granting appropriate relief.

1 Accordingly, Petitioner respectfully requests that the Court vacate the May 11, 2026
2 hearing and grant the Petition. Petitioner further requests that the Court order Respondents to
3 provide a prompt bond hearing within a timeframe set by the Court, and at such hearing require
4 the government to bear the burden of establishing, by clear and convincing evidence, that
5 continued detention is necessary to prevent flight or danger to the community.

6 Respectfully submitted,

7 /s/ Alejandro J. Monsalve, Esq. CA SBN 324958

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14 Dated: April 28, 2026