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

ASRA ZAREI,

Petitioner

v.

CHRISTOPHER J. LAROSE, et al.,

Respondents

Case No.: 26-cv-02932-JAO-AHG

**PETITIONER'S REPLY TO
RESPONDENTS' 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.

Specifically, Respondents acknowledge that, in light of the length of Petitioner's detention and the consistent rulings of courts within this District, this Court should order that Petitioner receive a bond hearing where the government bears the burden of establishing, by clear and convincing evidence, that Petitioner poses either a danger to the community or a risk of flight.

1 Because Respondents do not oppose the principal relief requested in the Petition, no
2 material factual or legal dispute remains for adjudication. Petitioner therefore respectfully
3 requests that the Court grant the Petition and order Respondents to provide Petitioner with a
4 prompt bond hearing before an Immigration Judge. At such hearing, the government should bear
5 the burden of proving, by clear and convincing evidence, that continued detention is necessary
6 because Petitioner poses either a danger to the community or a risk of flight, and the Immigration
7 Judge should have authority to order release.

8 Respectfully submitted,

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

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