

1 ADAM GORDON
United States Attorney
2 CAMILLE SAVEDRA
California Bar No. 336490
3 Assistant U.S. Attorney
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-5084
Email: camille.savedra@usdoj.gov

6 Attorneys for Respondents
7

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

11 ERIK CARBALLO-FIGUEROA,

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Petitioner,

v.

15 PATRICK DIVVER, Field Office Director
of the Immigration and Customs
Enforcement and Removal Operations, San
Diego Field Office; *et al.*,

Respondents.

Case No.: 26-cv-02984-BAS-BJW

RESPONSE TO PETITION

21 Petitioner appears to be a member of the Bond Eligible Class certified in *Maldonado*
22 *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL
23 3288403 (C.D. Cal. Nov. 25, 2025). The Ninth Circuit later stayed application of the Order
24 beyond the Central District of California. However, Respondents acknowledge the prior
25 orders from this District directing bond hearings pursuant to 8 U.S.C. § 1226(a) in similar
26 cases.¹

27
28
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

1 Respondents therefore do not oppose an order from this Court directing a bond
2 hearing be held pursuant to 8 U.S.C. § 1226(a).

3
4 DATED: May 20, 2026

ADAM GORDON
United States Attorney

5 s/ Camille Savedra
6 CAMILLE SAVEDRA
7 Assistant United States Attorney
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

27 _____
28 order provide the government 14 days from issuance to hold such bond hearing.