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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

LEONIE LIE LIE ABOKO OFFIONG, Petitioner, v. CHRISTOPHER J. LAROSE, et al., Respondents.	Case No.: 3:26-cv-03265-RSH-GC **RESPONSE TO PETITION**

Petitioner has filed a habeas petition under 28 U.S.C. § 2241. The Petition acknowledges that Petitioner is currently detained pursuant to 8 U.S.C. § 1225(b). ECF 1, paragraph 42, at page 8. Detention pursuant to 8 U.S.C. § 1225(b) is mandatory. *See Jennings v. Rodriguez*, 583 U.S. 281 (2018).

However, the government acknowledges that courts in this District have repeatedly inferred a constitutional right against prolonged mandatory detention. Taking into consideration those prior rulings and the length of time Petitioner has been in custody, the government concedes that this Court should order that Petitioner receive an

individualized bond hearing, where the government would bear the burden of proof of establishing, by clear and convincing evidence, that Petitioner poses a danger to the community or a risk of flight. *See Sadeqi v. LaRose*, 809 F.Supp.3d 1090 (S.D. Cal. 2025); *Gao v. LaRose*, 805 F.Supp.3d 1106 (S.D. Cal. 2025).

DATED: June 4, 2026

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