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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

KONYABA BACHIROU, Petitioner, v. JEREMY CASEY, Warden at Imperial Regional Detention Facility; *et al.*, Respondents.	Case No.: 26-cv-03322-BAS-MMP **RESPONSE TO PETITION**

Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b). *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 a 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*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12, 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26, 2025).

DATED: June 29, 2026

ADAM GORDON
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s/ Camille Savedra
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