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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

YANG ZHANG Petitioner, v. CHRISTOPHER LAROSE, Warden of the Otay Mesa Detention Center, *et al.*, Respondents	26-cv-03896-RFL-JAC **REPLY TO RESPONDENTS' RESPONSE** Honorable Janet A. Cabral United State Magistrate Judge

PETITIONER'S REPLY TO RESPONDENTS' RESPONSE

On July 15, 2026, following Honorable Judge's order, Respondents filed RESPONSE TO PETITION, stating that "The government acknowledges that this Court's prior decisions will control the result here if the Court adheres to its prior decisions, as the facts are not materially distinguishable for purposes of the Court's decision, 1 and on that basis the government does not oppose the petition and defers to the Court on the appropriate relief.".

Therefore, Petitioner respectfully request this Court find that YANG ZHANG warrants a injunction ordering that Respondents release him from his unlawful custody.

Respectfully submitted this July 15, 2026.

By counsel,

/s/ Hovhannes Bayburtski

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