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August 23, 2026

Hon. Anthony J. Brindisi
(filed via ecf)

Bhatti v. Venturella, et al., 9:26-cv-1620-AJB
Request for Order Regarding any Possible Re-Detention

Dear Judge Brindisi:

I filed a habeas petition for Muhammad Bhatti, who was detained without a warrant (as shown in Exhibit B to the Petition, he had no removal case/NTA prior to his arrest) on August 22, 2026. *Respondents released Petitioner that same evening.* I am requesting that the Court order:

1) That Petitioner not be re-detained without adequate notice to him and without an opportunity to be heard at a hearing where the Government will have the burden of showing that his detention is authorized under 8 USC 1226(a) and the burden to demonstrate by clear and convincing evidence that Petitioner is either a danger to the community or a flight risk; and

2) That pending the issuance of any final removal order against Petitioner, Respondents are enjoined from denying him bond in any subsequent proceeding on the basis that he must be detained pursuant to 8 U.S.C. § 1225(b), absent a change in relevant circumstances

If the Court needs further briefing on this request, I respectfully request a few days to provide that. Thank you.

Respectfully,

s/Kathy Manley
Pro Bono Counsel for Petitioner