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6 Attorney for Petitioner,

7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**

9 Miguel Ángel Figueroa Morales,
10
11 Petitioner,

) Case No. 3:26-cv-00679-GPC-BJW

12 v.

) PETITIONER'S TRAVERSE

13 PAM BONDI, Attorney General of the
14 United States, in her official capacity;
15 KRISTI NOEM, Secretary of the U.S.
16 Department of Homeland Security, in her
17 official capacity; EXECUTIVE OFFICE
18 FOR IMMIGRATION REVIEW; TODD
19 LYONS, Acting Director of U.S.
20 Immigration and Customs Enforcement,
21 in his official capacity; GREGORY J.
22 ARCHAMBEAULT, ICE Field Office
23 Director for Imperial County, in his
24 official capacity, WARDEN of Imperial
25 Regional Detention Facility.

26 Respondents.

27 **PETITIONER'S TRAVERSE**

28 1. Petitioner, through undersigned counsel, hereby submits this Traverse pursuant to the Court's scheduling order.

PETITIONER'S TRAVERSE

1 2. The Court ordered Respondent to file a Return addressing the allegations set
2 forth in the Petition by February 6, 2026, and Petitioner a Traverse by February 9,
3 2026. As of the date of this filing, Respondent has not filed an Answer, Return, or
4 request for extension of time.
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7 3. Accordingly, the factual allegations and legal arguments presented in the
8 Petition remain un rebutted. No statutory or constitutional basis has been asserted to
9 justify Petitioner's continued detention.
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12 4. Given the absence of any response and the liberty interests at stake,
13 Petitioner respectfully submits that the matter is properly before the Court on the
14 existing record and ripe for determination.
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16 5. Petitioner respectfully requests that the Court grant the Petition for Writ of
17 Habeas Corpus and order Petitioner's immediate release.
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19 Dated: February 9, 2026

Respectfully submitted,

21 /s/LeRoy George Siddell
22 LeRoy George Siddell
23 Attorney for Petitioner
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PETITIONER'S TRAVERSE