

Hannah Kazim (SBN 318656)
hkazim@immdef.org
IMMIGRANT DEFENDERS LAW CENTER
634 S. Spring St.
Los Angeles, CA 90014
Telephone: (213) 224-0363

Pro Bono Attorney for Petitioner

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

Mohammed Awal ABDUL RAHMAN,

Petitioner,

vs.

JEREMY CASEY, Warden, Imperial
Regional Detention Facility;
GREGORY J. ARCHAMBEAULT,
Field Officer Director for the San Diego
Immigration and Customs Enforcement
Office; TODD LYONS, Acting
Director of United States Immigration
and
Customs Enforcement; KRISTI NOEM,
Secretary of the United States
Department of Homeland Security,
PAMELA BONDI, Attorney General of
the United States, acting in their official
capacities

Respondents.

Case No. 3:26-cv-01418-RSH-BJW

**PETITIONER'S TRAVERSE IN
SUPPORT OF PETITION FOR
WRIT OF HABEAS CORPUS**

On March 18, 2026, Respondents filed their Response to Petition, in which they "concede[]" 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

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1 convincing evidence, that Petitioner poses a danger to the community or a risk of
2 flight.” Response to Petition (Doc. 5). Mr. Abdul Rahman greatly appreciates
3 Respondents’ prompt Return, candor, and good faith in this matter.
4

5 Mr. Abdul Rahman thus takes this opportunity to briefly reiterate his request
6 for this Court to order his outright release from custody forthwith. This Court has
7 the authority to make such an order, and courts in this Circuit regularly do. *See, e.g.,*
8 *Singh v. Warden of the Golden State Annex Detention Facility*, 2026 WL 171952 at
9 *7 (E.D. Cal., Jan. 22, 2026).

10 This Court should relieve Mr. Abdul Rahman from the obligation to first
11 participate in a bond hearing where an Immigration Judge could improperly deny
12 release on bond. *See Judulang v. Chertoff*, 562 F. Supp. 2d 1119, 1126–27 (S.D.
13 Cal. 2008) (ordering release where evidence did not satisfy the government’s
14 evidentiary burden at a bond hearing post grant of writ of habeas); *Mau v. Chertoff*,
15 562 F.Supp.2d 1107, 1118-19 (S.D. Cal. 2008) (same).
16

17 Mr. Abdul Rahman has been subjected to prolonged and punitive detention,
18 in violation of his rights under the Due Process Clause of the Fifth Amendment, for
19 15 months now. He has indicated his willingness to participate in alternatives to
20 detention programs, including location monitoring, and his eagerness to continue his
21 immigration case with the assistance of undersigned counsel and extensive
22 community support. Mr. Abdul Rahman has a detailed release plan that includes
23 housing, communication, transportation, and educational opportunities. *See* Doc.
24 1:1 at Exh. G. He has no criminal convictions anywhere in the world, and has
25 exhibited exclusively exemplary behavior during his time in detention. This Court
26 should find that he merits immediate release.

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PRAYER FOR RELIEF

Given the government's concession in this case, Mr. Abdul Rahman respectfully requests that this Court:

1. Issue a Writ of Habeas Corpus ordering Respondents to release Mr. Abdul Rahman from custody forthwith;
2. In the alternative, hear and determine the facts, as described in 28 U.S.C. § 2243, at a prompt bail hearing before this Court, evaluate Petitioner's ability to pay in setting bond, and consider alternative conditions of release;
3. In the alternative, order Respondents to schedule a bond hearing where the government must establish by clear and convincing evidence that Petitioner presents a risk of flight or danger, taking into consideration alternatives to detention as well as Petitioner's ability to pay a bond, to justify continued detention;
4. Enjoin Respondents from causing Petitioner any greater harm during the pendency of this litigation and immigration court case, such as by transferring him away from his counsel and this judicial District;
5. Grant such further relief as the Court deems just, equitable, and appropriate.

1 Dated: 03/18/2026

Respectfully submitted,
s/ Hannah Kazim

Hannah Kazim
Immigrant Defenders Law Center
Pro Bono Attorney for Petitioner

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