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9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 JIAXING XIE,

12 Petitioner-Plaintiff,

13 v.

14 CHRISTOPHER J. LAROSE, et al.

15 Respondents-Defendants.
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Case No.: 26-cv-01421-LL-BLM

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

1 Respondents have conceded that Petitioner is entitled to a bond hearing before a
2 neutral decisionmaker. Petitioner accepts this concession and submits that the Court
3 should order such a hearing immediately, with the following procedural protections,
4 consistent with the Ninth Circuit's holdings in *Singh v. Holder*, 638 F.3d 1196 (9th Cir.
5 2011), and *Hernandez v. Sessions*, 872 F.3d 976 (9th Cir. 2017): [burden of proof, clear
6 and convincing evidence, consideration of alternatives, ability to pay].
7

8 In the alternative, and in light of the prolonged nature of Petitioner's detention
9 without an individualized detention, Petitioner maintains his request for immediate
10 release under 28 U.S.C. § 2241.

11 Dated: March 16, 2026,

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13 By: /s/ Bashir Ghazialam
14 Bashir Ghazialam
15 Attorney for Petitioner
16 Email: bg@lobg.net
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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2026, I caused the foregoing document to be electronically filed with the Clerk of the Court for the United States District Court for the Southern District of California by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

Executed on: March 16, 2026

/s/ Bashir Ghazialam
Bashir Ghazialam