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9
10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 JEFFERSON FABIAN PLUAS
13 URENA,

14 Petitioner,

15 v.

16 KRISTI NOEM, Secretary of the
17 Department of Homeland Security,
18 PAMELA JO BONDI, Attorney General,
19 TODD M. LYONS, Acting Director,
20 Immigration and Customs Enforcement,
21 JESUS ROCHA, Acting Field Office
22 Director, San Diego Field Office,
23 CHRISTOPHER LAROSE, Warden at
24 Otay Mesa Detention Center,

25 Respondents.

CIVIL CASE NO.: 26-cv-1410-LL

**Traverse in Support of
Petition for a Writ
of Habeas Corpus**

26 In his amended petition, Jefferson Fabian Pluas Urena explained that
27 despite his compliance with his parole conditions, ICE revoked his parole
28 arbitrarily and without following regulations. He therefore made two claims:
(1) ICE had failed to comply with its own regulations, violating the
Administrative Procedures Act, and (2) ICE violated due process by revoking
parole without notice and an opportunity to be heard. **He therefore asked this
Court to order outright release.**

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1 The government's response does not dispute any of the facts set forth in
 2 Mr. Urena's amended petition. *See* Gov. Response, ECF No. 8. Moreover, the
 3 government concedes that "this Court, and Courts in this District, have repeatedly
 4 [granted petitions] under the same and/or similar facts." *Id.* at 2. Thus, "the
 5 government does not oppose the petition and defers to the Court on the
 6 appropriate relief." *Id.* at 3.

7 As set forth in Mr. Urena's petition, outright release is the appropriate relief
 8 here. When an immigrant's parole is unlawfully revoked, the remedy is release,
 9 not a bond hearing. *See, e.g., Arias v. Larose*, No. 3:25-CV-02595-BTM-MMP,
 10 2025 WL 3295385, at *3 (S.D. Cal. Nov. 25, 2025) ("The Respondents shall
 11 immediately release Arias from custody on her preexisting conditions."); *Noori v.*
 12 *LaRose*, 807 F. Supp. 3d 1146, 1154 (S.D. Cal. 2025) ("order[ing] his immediate
 13 release"); *Salazar v. Casey*, No. 25-CV-2784 JLS-VET, 2025 WL 3063629 (S.D.
 14 Cal. Nov. 3, 2025) (ordering that ICE "immediately release Petitioner from
 15 custody subject to the conditions of her preexisting parole and Form I-94"); *Perez*
 16 *v. LaRose*, No. 25-CV-02620-RBM-JLB, 2025 WL 3171742 (S.D. Cal. Nov. 13,
 17 2025) (ordering respondents "to immediately release Petitioner from custody,
 18 subject to the conditions of his preexisting parole and Form I-94"); *Y-Z-L-H v.*
 19 *Bostock*, No. 25-CV-965-SI, 2025 WL 1898025, at *13 (D. Or. July 9, 2025)
 20 (ordering respondents "immediately to release Petitioner from custody").

21 Thus, this Court should grant Mr. Urena's prompt and outright release.

22
 23 Respectfully submitted,

24 Dated: April 2, 2026

s/ Camille Fenton

Camille Fenton

Federal Defenders of San Diego, Inc.

Attorneys for Mr. Urena