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Attorneys for Mr. Singh

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

GURNOOR SINGH,

Petitioner,

v.

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

Respondents.

Civil Case No.: 26-cv-1389-BTM-VET

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

1 In his amended habeas petition, Mr. Singh argued that his prolonged
2 detention without a bond hearing violated due process. As the remedy, he
3 requested that this Court grant his immediate release or at least a bond hearing
4 with additional safeguards—particularly that this Court 1) the IJ shall consider
5 alternative conditions of release and Petitioner’s ability to pay bond; and
6 2) Respondents shall make a complete record of the bond hearing available to
7 Petitioner’s counsel.

8 In response, Respondents oppose Mr. Singh’s request for immediate release
9 but “concedes that this Court should order that Petitioner receive a bond hearing,
10 where the government would bear the burden of proof of establishing, by clear
11 and convincing evidence, that Petitioner poses a danger to the community or a
12 risk of flight.” Dkt. 8 at 1. Thus, the only dispute in this case is what form of relief
13 Mr. Singh should receive.

14 Mr. Singh maintains that immediate release is the correct remedy in his
15 case. However, if this Court only orders the government to provide a bond
16 hearing, he asks that this Court include three requirements:

- 17 a. At the hearing, the government SHALL BEAR the burden of
18 establishing by clear and convincing evidence that Petitioner is a
19 danger to the community or a flight risk if released.
- 20 b. The IJ SHALL consider alternative conditions of release and
21 Petitioner's ability to pay bond.
- 22 c. Respondents SHALL make a complete record of the bond hearing
23 available to Petitioner and his counsel.

24 *See Sandesh v. Noem*, 26-cv-846-JES-DDL, Dkt. 13 at 11 (S.D. Cal. Mar. 4,
25 2026). Mr. Singh also requests that this Court retain jurisdiction to review the
26 immigration judge bond decision to ensure compliance with the Court’s order and
27 due process.

Respectfully submitted,

Dated: March 25, 2026

s/ Kara Hartzler

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