

1 **Kara Hartzler**
2 Cal. Bar No. 293751
3 **Federal Defenders of San Diego, Inc.**
4 225 Broadway, Suite 900
5 San Diego, California 92101-5030
6 Telephone: (619) 234-8467
7 Facsimile: (619) 687-2666
8 Kara_hartzler@fd.org
9 Attorneys for Mr. Farooq

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

11 MUHAMMAD FAROOQ,
12 Petitioner,
13 v.
14 KRISTI NOEM, Secretary of the
15 Department of Homeland Security, et al.
16 Respondents.

No.: 26-cv-1496-CAB-BJW

**Traverse in support of
petition for writ of
habeas corpus**

**[Civil Immigration Habeas,
28 U.S.C. § 2241]**

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1 In its return, the government acknowledges that “there is no significant
2 likelihood that Petitioner is removed in the reasonably foreseeable future” such
3 that he should be released from custody. Dkt. 5 at 1. Mr. Farooq thus requests that
4 this Court grant his habeas petition and order his immediate. release.

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6 Respectfully submitted,

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8 Dated: March 18, 2026

s/ Kara Hartzler

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Federal Defenders of San Diego, Inc.
10 Attorneys for Mr. Farooq
11 Email: kara_hartzler@fd.org