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

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|---|---|
| Luis Fernando RAX GOMEZ,<br>Petitioner,<br><br>v.<br><br>Pamela J. Bondi, et al.,<br><br>Respondents. | Case No. 26-cv-1553-JO-DEB<br><br>Agency No. [redacted]<br><br>**TRAVERSE** |

Petitioner, Luis Fernando Rax Gomez ([redacted]) (hereinafter "Petitioner" or "Mr. Rax Gomez"), by and through counsel submit this traverse. According to Respondents response, there is no opposition to this petition and so Petitioner requests an order directing Respondents to schedule a bond hearing imminently to protect his rights. Given some recent developments at bond hearings wherein judges are still denying bond after a habeas petition is granted, Petitioner requests the court consider the below language when drafting an order:

> Respondents SHALL NOT deny Petitioner's bond on the basis that 8 U.S.C. § 1225(b)(2) requires mandatory detention. Respondents must provide a bond hearing before a fair and neutral immigration judge.

Dated: March 26, 2026

Respectfully submitted,

/s/ *Leah L. Chavarria*
Leah L. Chavarria
*Counsel for Counsel*