

1 Naira Zohrabyan, Esq. [SBN 337925]
2 ZOHRABYAN LAW, APC
3 100 W. Broadway, Suite 540
4 Glendale, CA 91210
5 Tel: 323-246-3284
6 Fax: (747) 327-4059
7 Email: naira@zohrabyanlaw.com

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



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15 **Hayleyesus Gebru Gebremeskel,**

16
17 **Petitioner**

18
19 **v.**

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21 **Jeremy Casey, et al**

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23 **Respondent**
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Case Number:

Case Number: 3:26-cv-01631

**PETITIONER'S TRAVERSE
AND REQUEST GRANTING
PETITION FOR HABEAS
CORPUS**

1 Pursuant to Response filed by Respondents on April 14, 2026, Respondents
2 acknowledge that courts in this District have inferred a constitutional right against
3 prolonged mandatory detention. Taking into consideration those prior rulings and the
4 length of time Petitioner has been in custody, the government concedes that this Court
5 should order that Petitioner receive a bond.

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7 As such, Petitioner requests that this Court grant the Petition for Writ of Habeas
8 Corpus.

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10 DATED: April 30, 2026

Respectfully submitted



Naira Zohrabyan
Attorney for Petitioner
Zohrabyan Law, APC



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CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this PETITIONER'S TRAVERSE AND REQUEST GRANTING PETITION FOR HABEAS CORPUS, using the CM/ECF system.

DATED: April 30, 2026

Respectfully submitted



Naira Zohrabyan
Attorney for Petitioner
Zohrabyan Law, APC

