

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 Ms. Mrach

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

12 NATSNET GUESH MRACH,  
13  
14 Petitioner,

15 v.

16 KRISTI NOEM, Secretary of the  
17 Department of Homeland Security, et al.  
18  
19 Respondents.  
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No.: 26-cv-1676-JO-DEB

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

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

In its return, the government concedes that because there is “no evidence to suggest there is a significant likelihood that Petitioner is removed in the reasonably foreseeable future,” Ms. Mrach is “entitled to be released from custody” subject to conditions of supervision. Dkt. 4 at 1–2. Ms. Mrach thus requests that this Court immediately grant her habeas petition and order her released.

Respectfully submitted,

Dated: March 23, 2026

*s/ Kara Hartzler*

Federal Defenders of San Diego, Inc.

Attorneys for Ms. Mrach

Email: kara\_hartzler@fd.org