

1 Petitioner submits this Traverse and Memorandum to comply with the Court's order and the
2 habeas corpus procedure and to expedite the process.

3 Petitioner agrees with respondents that he appears to be a member of the Bond Eligible
4 Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d
5 ---, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). The *Baustista* court has now entered a final
6 judgment in that case. However, the Ninth Circuit has issued a stay in that case.

7 Still, the court should issue an order directing the immigration judge to conduct a bond
8 hearing pursuant to 8 USC § 1226(a). Despite the numerous court rulings in habeas corpus
9 petitioner over the last several months, the immigration judges and OPLA trial attorneys at Otay
10 Mesa Immigration Court continue to argue that noncitizens like petitioner are detained under 1225.

11 DATED: 24 March 2026

12 Respectfully submitted,

13 /s/ *William Baker*

14 William Baker (157 906)

15 MORENO & ASSOCIATES
16
17
18
19
20
21
22
23
24
25
26
27
28