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

13 HUANYAN YAN,
14
15 Petitioner,
16
17 v.
18 KRISTI NOEM, Secretary of the
19 Department of Homeland Security, et al.
20
21 Respondents.

No.: 26-cv-1703-LL-MMP

**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 concedes that it is unable to ascertain
2 sufficient facts at this time to establish that there is a significant likelihood of
3 removal in the reasonably foreseeable future” and thus acknowledge that Mr. Yan
4 is “entitled to be released from custody subject to conditions of supervision.” Dkt.
5 4 at 2. Mr. Yan thus requests that this Court immediately grant his habeas petition
6 and order him released.

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Respectfully submitted,

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10 Dated: March 25, 2026

s/ Kara Hartzler

Federal Defenders of San Diego, Inc.

Attorneys for Mr. Yan

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