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

12 **SELOMON GEBREMESKEL**
13 **TESEMA,**

14 **Petitioner,**

15 **v.**

16 **KRISTI NOEM, Secretary of the**
17 **Department of Homeland Security, et al.**

18 **Respondents.**

No.: 26-cv-1714-RBM-DDL

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

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

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1 In his amended petition, Mr. Tesema explained that he is an asylum seeker
2 from Ethiopia who was severely persecuted on account of ~~XXXXXXXXXX~~ and has
3 been subject to prolonged detention since he arrived in the U.S. Dkt. 5; Dkt. 5,
4 Exh. A.

5 In its return, Respondents state that “[t]he government does not oppose the
6 petition and agrees that this Court should order that Petitioner receive a bond
7 hearing, where the government would bear the burden of proof of establishing, by
8 clear and convincing evidence, that Petitioner poses a danger to the community or
9 a risk of flight.” Dkt. 7 at 1.

10 Thus, this Court should grant the petition and order at a minimum that
11 Mr. Tesema receive a bond hearing.

12 Respectfully submitted,

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14 Dated: April 2, 2026

s/ Kara Hartzler
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