

1 **Jessie Agatstein**  
2 Cal. Bar No. 319817  
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 jessie\_agatstein@fd.org  
9 Attorneys for Mr. Yahyapour

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

11 **FARHAD YAHYAPOUR GHAZVINI,**

12 **Petitioner,**

13 **v.**

14 **MARKWAYNE MULLIN, Secretary of**  
15 **the Department of Homeland Security,**  
16 **PAMELA JO BONDI, Attorney General,**  
17 **TODD M. LYONS, Acting Director,**  
18 **Immigration and Customs Enforcement,**  
19 **JESUS ROCHA, Acting Field Office**  
20 **Director, San Diego Field Office,**  
21 **CHRISTOPHER LAROSE, Warden at**  
22 **Otay Mesa Detention Center,**

23 **Respondents.**

Case No.: 26-cv-1785-LL-DDL

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

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

21 In their return, Respondents “acknowledge that Petitioner is entitled to be  
22 released from custody” under *Zadvydas*. ECF No. 10. They agree with  
23 Mr. Yahyapour that the proper remedy is “release[] from custody subject to  
24 conditions of supervision” under 8 U.S.C. § 1231(a)(3). *Id.*

25 Respondents do not address or dispute Mr. Yahyapour’s second claim in his  
26 amended petition, that ICE failed to comply with due process and its own  
27 regulations while re-detaining him. ECF No. 9 at 10–12.  
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