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9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 Vladimir OVCHINNIKOV

12 Petitioner,

13 v.
14

15 *Jeremy CASEY, Warden, Imperial*
16 *Regional Detention Facility, et al.,*

17 Respondents.
18
19

Case No.: 26-cv-01953-DMS-AHG

**TRAVERSE IN SUPPORT OF
PETITION FOR WRIT OF HABEAS
CORPUS**

20
21 Respondents concede “that this Court should order that Petitioner receive a
22 bond hearing, where the government would bear the burden of proof of
23 establishing, by clear and convincing evidence, that Petitioner poses a danger to
24 the community or a risk of flight.” ECF No. 4.

25 In light of this concession, and for the reasons stated in the Petition, this
26 Court should order Respondents to provide a *prompt* individualized bond hearing
27 before a *neutral* adjudicator at which the Government bears the burden by clear
28 and convincing evidence. ECF No. 1 at 15. Petitioner respectfully requests that

1 any resultant order by this Court explicitly retains jurisdiction over this petition so
2 that Petitioner will be able to seek further relief therefrom should a subsequent
3 bond hearing before an immigration judge fail to comport with due process.
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5 Dated: April 9, 2026

Respectfully submitted,

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7 By: /s/ Zohaile Kakavand
8 Zohaile Kakavand
9 Casa Cornelia Law Center
10 *Pro Bono Counsel for Petitioner*
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