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

12 ALPHA OUMAR DIALLO,  
13 Petitioner,  
14 v.  
15 JEREMY CASEY, Warden at Imperial  
16 Regional Detention Center,  
17 Respondents.

CIVIL CASE NO.: 26-cv-2033-BJC

**Traverse in Support of  
Petition for a  
Writ of Habeas Corpus**

18 Mr. Diallo filed an amended habeas petition alleging that the government  
19 violated the Administrative Procedures Act and the Due Process Clause in  
20 revoking his parole. The government now concedes that this Court has granted  
21 petitions on materially identical facts, while deferring to the court on the proper  
22 relief. Doc. 11 at 2-3. Courts in this district agree that the proper relief in these  
23 circumstances is immediate release. *See, e.g., Arias v. Larose*, No. 3:25-CV-  
24 02595-BTM-MMP, 2025 WL 3295385, at \*3 (S.D. Cal. Nov. 25, 2025) (“The  
25 Respondents shall immediately release Arias from custody on her preexisting  
26 conditions.”); *Noori v. LaRose*, 807 F. Supp. 3d 1146, 1154 (S.D. Cal. 2025)  
27 (“order[ing] his immediate release”); *Salazar v. Casey*, No. 25-cv-2784 JLS-VET,  
28 2025 WL 3063629 (S.D. Cal. Nov. 3, 2025) (ordering that ICE “immediately  
release Petitioner from custody subject to the conditions of her preexisting parole

1 and Form I-94”); *Perez v. LaRose*, No. 25-cv-02620-RBM-JLB, 2025 WL  
2 3171742 (S.D. Cal. Nov. 13, 2025) (ordering respondents “to immediately release  
3 Petitioner from custody, subject to the conditions of his preexisting parole and  
4 Form I-94”); *Y-Z-L-H v. Bostock*, No. 25-cv-965-SI, 2025 WL 1898025, at \*13  
5 (D. Or. July 9, 2025) (ordering respondents “immediately to release Petitioner  
6 from custody”).

7 This Court should therefore order Mr. Diallo’s immediate release. A  
8 proposed order will follow.

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Respectfully submitted,

Dated: April 27, 2026

s/ Katie Hurrelbrink  
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