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

10 HUSSAIN SYED AMJAD,

11 Petitioner,

12 v.

13 JEREMY CASEY, Warden at Imperial  
14 Regional Detention Center,

15 Respondents.

CIVIL CASE NO.: 26-cv-2044-JES

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

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17 The government concedes that this Court should grant a bond hearing  
18 consistent with circuit practice. Doc. 11. The government does not address  
19 Mr. Abbasov's arguments in favor of outright release, thereby forfeiting the point.  
20 *See United States v. Peterson*, 902 F.3d 1016, 1022 n.2 (9th Cir. 2018); *United*  
21 *States v. Castillo-Marin*, 684 F.3d 914, 919 (9th Cir. 2012). In light of the  
22 government's forfeiture, this Court should grant outright release. But at a  
23 minimum, this Court should grant a bond hearing where the government has the  
24 burden to prove flight or danger by clear and convincing evidence.  
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Respectfully submitted,

Dated: April 14, 2026

*s/ Katie Hurrelbrink*

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