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

13 ANWAR NAGASH IBRAHIM,

14 Petitioner,

15 v.

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

18 Respondents.

No.: 26-cv-2048-LL-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. Ibrahim explained that he was born in Kuwait
2 and granted withholding of removal. Nevertheless, his case is on appeal and he
3 has now been detained for 20 months. In its return, the government “concedes that
4 this Court should order that Petitioner receive a bond hearing, where the
5 government would bear the burden of proof of establishing, by clear and
6 convincing evidence, that Petitioner poses a danger to the community or a risk of
7 flight.” Dkt. 9 at 1.

8 Thus, this Court should grant the petition and order at a minimum that
9 Mr. Ibrahim receive a bond hearing. He also requests that this Court order the
10 immigration judge to consider alternative conditions of release and Petitioner’s
11 ability to pay bond and that Respondents make a complete record of the bond
12 hearing available to Petitioner and his counsel.

13 Respectfully submitted,

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15 Dated: April 23, 2026

16 *s/ Kara Hartzler*
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