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

13 **YASMANY SUAREZ LOPEZ,**
14 Petitioner,

15 v.

16 **SIXTO MARRERO,** in his official capacity as
Warden of the Imperial Regional Detention
17 Facility;

18 **DANIEL A. BRIGHTMAN,** in his official
capacity as
19 Field Office Director, ICE San Diego Field Office;

20 **MARKWAYNE MULLIN,** in his official
capacity as Secretary of the United States
21 Department of Homeland Security,

22 *Respondents.*

Case No. 3:26-cv-02077-JES-VET

**PETITIONER'S TRAVERSE IN
SUPPORT OF PETITION FOR
WRIT OF HABEAS CORPUS**

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1 Petitioner respectfully submits that Respondents' Return confirms that the legal issue
2 presented is governed by controlling decisions in this District and that the facts are not
3 materially distinguishable. Respondents expressly do not oppose the Petition and defer to the
4 Court as to the appropriate relief. Accordingly, the Petition should be granted without further
5 delay.

6 Petitioner maintains that immediate release is the appropriate remedy under the
7 circumstances. In the alternative, should the Court order a bond hearing under 8 U.S.C. §
8 1226(a), Petitioner respectfully requests that such hearing be conducted on an expedited basis
9 given the ongoing deprivation of liberty.

10 DATED: April 9, 2026

11 /s/ Nicolette Glazer

12 Nicolette Glazer Esq.
13 Magda D. Lopez Rodriguez, Esq.
14 *Counsel for Petitioner*

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2026, the foregoing PETITIONER’S TRAVERSE IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the Office of the United States Attorney for the Southern District of California and to all parties who have appeared in this action.

DATED: April 9, 2026

/s/ Magda D. Lopez Rodriguez
Magda D. Lopez Rodriguez, Esq.
Nevada Bar No. 16916
Counsel for Petitioner