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

MOSAZIG MEHARI MEDHANI,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of
the Department of Homeland Security,
TODD BLANCHE, Acting Attorney
General, TODD M. LYONS, Acting
Director, Immigration and Customs
Enforcement, JESUS ROCHA, Acting
Field Office Director, San Diego Field
Office, JEREMY CASEY, Warden at
Imperial Regional Detention Center,

Respondents.

Case No.: 26-cv-2090-CAB-JLB

**Traverse in support of unopposed
amended petition for writ of habeas
corpus**

**[Civil Immigration Habeas Petition
Under 28 U.S.C. § 2241]**

In his amended petition, Mr. Medhani requested either his immediate release or a bond hearing based on his prolonged detention with certain procedural safeguards. ECF No. 9.

In response, the government “concedes that this Court should order that Petitioner receive a bond hearing, where the government would bear the burden of proof of establishing, by clear and convincing evidence, that Petitioner poses a danger to the community or a risk of flight.” ECF No. 12 at 1–2. It does not dispute any other specific safeguards Mr. Medhani identifies.

1 Therefore, Mr. Medhani requests that this Court, at a minimum, issue the
2 following relief, *see* ECF No. 9 at 7–8:

- 3 1. Mr. Medhani receive an individualized bond hearing before a neutral
4 immigration judge within the next 14 days,
- 5 a. At which hearing the government shall bear the burden of proof
6 of establishing by clear and convincing evidence that Mr.
7 Medhani and poses a danger to the community or is a risk of
8 flight, and
- 9 b. At which hearing the immigration judge shall consider
10 alternative conditions of release and Mr. Medhani’s ability to
11 pay bond; and
- 12 2. Respondents make the record of the hearing available to
13 Mr. Medhani and his counsel upon request.

14 Respectfully submitted,

15
16 Dated: May 6, 2026

s/ Jessie Agatstein
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