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

13 LEONID SALIKOV,

14 Petitioner,

15 v.

16 MARKWAYNE MULLIN, Secretary of
17 the Department of Homeland Security, et
18 al.

19 Respondents.

No.: 26-cv-2129-BJC-SBC

**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. Salikov established that he is a citizen of
2 Russia who was released so that he could seek asylum in the United States. Dkt.
3 6; Dkt. 6, Exh. A. He argued that Respondents unlawfully revoked his parole in
4 violation of the regulations, the statute, and due process, which require written
5 notification and a determination that the purposes of parole have been served. *See*
6 8 U.S.C. § 1182(d)(5)(A) (stating that a person shall only be “returned to the
7 custody from which he was paroled” when “the purposes of such parole . . . have
8 been served”); *see also* 8 C.F.R. § 212.5(e)(2)(i) (parole may only be terminated
9 “upon accomplishment of the purpose for which parole was authorized” and
10 “upon written notice to the alien”). Because Mr. Salikov’s revocation of parole
11 was unlawful, he argued that this Court should order Respondents to
12 “immediately *release* Petitioner from custody, subject to the conditions of his
13 preexisting parole.” Dkt. 6 at 7 (emphasis added).

14 In its return, Respondents admit that they have “insufficient information
15 regarding termination of [Mr. Salikov’s] parole, pursuant to 8 C.F.R.
16 § 212.5(e)(2), to provide to the Court.” Dkt. 8 at 2. Thus, “the government does
17 not oppose the petition and defers to the Court on the appropriate relief.” Dkt. 8 at
18 3. Because Mr. Salikov’s claim involved the unlawful revocation of his parole,
19 the correct remedy is to order his release, rather than a bond hearing.¹ Thus, this
20 Court should grant the petition and order his immediate release.

21 Respectfully submitted,

22 Dated: April 28, 2026

s/ Kara Hartzler

Federal Defenders of San Diego, Inc.

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26 ¹ *See, e.g., Arias v. Larose*, No. 3:25-CV-02595-BTM-MMP, 2025 WL 3295385,
27 at *3 (S.D. Cal. Nov. 25, 2025); *Noori v. LaRose*, No. 25-cv-1824-GPC-MSB,
28 2025 WL 2800149 (S.D. Cal. Oct. 1, 2025); *Salazar v. Casey*, No. 25-cv-2784
JLS-VET, 2025 WL 3063629 (S.D. Cal. Nov. 3, 2025); *Perez v. LaRose*, No. 25-
cv-02620-RBM-JLB, 2025 WL 3171742 (S.D. Cal. Nov. 13, 2025).