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

12 ALEXIS SOLANO ABRAHAM,) Case No. 26-cv-02155-DMS-AHG
13)
14 Petitioner,)
15 v.)
16) **TRAVERSE TO PETITION**
17 CHRISTOPHER J. LAROSE, Senior)
18 Warden, Otay Mesa Detention)
19 Center; DANIEL A. BRIGHTMAN,)
20 San Diego Field Office Director)
21 U.S. Immigration & Customs)
22 Enforcement (ICE); TODD LYONS,)
23 Acting Director U.S. ICE;)
24 MARKWAYNE MULLIN, U.S.)
25 Secretary of Homeland Security)
26 TODD BLANCHE, Acting Attorney.)
27 General of the United States.)
28 Respondents.)
_____)

1 Respondents, through counsel, have filed their Return to the Petition filed in
2 the above-captioned matter. Counsel for the Respondent(s) agrees Petitioner appears
3 to be a member of the Bond Eligible Class certified in *Maldonado Bautista v.*
4 *Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---- 2025 WL 3288403
5 (C.D. cal. Nov. 25, 2025). Respondents further submit they do not oppose an order
6 from this Court directing a bond hearing be held pursuant to 8 U.S.C. § 1226(a).
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10 In light of the Respondents' non-opposition, Petitioner respectfully requests
11 this Court declare Petitioner's detention violates the Due Process Clause of the Fifth
12 Amendment to the U.S, Constitution, the INA and the APA; Issue a Writ of Habeas
13 Corpus finding Petitioner is eligible for release on bond pursuant to 8 U.S.C. §
14 1225(a), order the U.S. Immigration Court conduct a bond hearing pursuant to 8
15 U.S.C. § 1225(a) and release Petitioner on a reasonable bond.
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19 DATED: April 13, 2026
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21 Respectfully submitted,

22 /s/ Thomas A. Lappin
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24 _____
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