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

13 SADEGHIAN LOTFABADI SALEH,

No.: 26-cv-2132-BJC-JLB

14 Petitioner,

15 v.

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

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

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

19 Respondents.
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1 In his amended petition, Mr. Saleh established that he is a citizen of Iran
2 who was granted withholding of removal. Because his removal is not significantly
3 likely in the reasonably foreseeable future, he argued that his ongoing detention
4 violated *Zadvydas v. Davis*, 533 U.S. 678 (2001).

5 In their return, Respondents state that there is “no evidence to suggest there
6 is a significant likelihood that Petitioner is removed in the reasonably foreseeable
7 future” such that “Petitioner is entitled to be released from custody.” Dkt. 10 at 1.
8 Thus, this Court should immediately grant the petition and order Mr. Saleh’s
9 release.

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11 Dated: April 22, 2026

Respectfully submitted,

s/ Kara Hartzler

Federal Defenders of San Diego, Inc.

Attorneys for Petitioner

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