

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

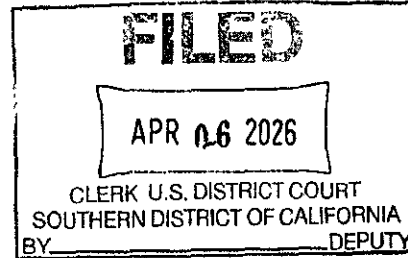
BERMAN JOSE SOBALVARRO SOMBARRIBA,



Petitioner,

v.

Case No: '26 CV2238 RBM DDL



WARDEN, IMPERIAL REGIONAL DETENTION FACILITY;
ICE FIELD OFFICE DIRECTOR, SAN DIEGO;
U.S. DEPARTMENT OF HOMELAND SECURITY,


Respondents.

EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS
(28 U.S.C. § 2241)

1. JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner is in federal custody in violation of the Constitution and laws of the United States.

2. CUSTODY STATUS

Petitioner, Berman Jose Sobalvarro Sombarriba  is currently detained at Imperial Regional Detention Facility in Calexico, California.

Petitioner has been continuously detained since October 1, 2025.

Petitioner has never been brought before an immigration judge and has not received any bond hearing or custody review.

3. GROUNDS FOR RELIEF

Ground One: Prolonged Detention Without Judicial Hearing

Petitioner has been detained for over six months without ever being brought before an immigration judge.

This violates the Due Process Clause of the Fifth Amendment.

Ground Two: Denial of Bond Hearing

The petitioner has been denied any meaningful opportunity to challenge detention.

Prolonged detention without a bond hearing is unconstitutional.

Ground Three: Unlawful Executive Detention

Respondents are detaining Petitioner without judicial oversight, without charges, and without providing any legal process.

Such detention violates fundamental constitutional protections.

4. SUPPORTING FACTS

- Detained since: October 1, 2025
- Length of detention: approximately six months
- Location: Imperial Regional Detention Facility, Calexico, California
- No immigration court hearing (in person or video)
- No bond hearing
- No opportunity to challenge detention

5. EXHAUSTION

Petitioner has no adequate or effective remedy available due to the complete denial of access to a hearing.

6. REQUEST FOR EMERGENCY RELIEF

The petitioner is suffering ongoing unlawful detention and requests immediate intervention.

7. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Court:

1. Issue a writ of habeas corpus;
2. Order Petitioner's immediate release; AND
3. Order Respondents to provide a prompt bond hearing before an immigration judge within a fixed time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 04/01/2026

Signature: [Redacted]

Site: [Redacted]

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BERMAN JOSE SOBALVARRO SOMBARRIBA,



Petitioner,

v. Case No: _____

WARDEN, IMPERIAL REGIONAL DETENTION FACILITY, et al.,
Respondents.

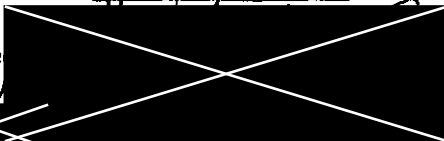
DECLARATION OF BERMAN JOSE SOBALVARRO SOMBARRIBA

I, Berman Jose Sobalvarro Sombarriba, declare:

1. I am currently detained at Imperial Regional Detention Facility in Calexico, California.
2. I have been continuously detained since approximately October 1, 2025.
3. Since my detention began, I have never been brought before an immigration judge.
4. I have not had any court hearing, either in person or by video.
5. I have not received any bond hearing or opportunity to challenge my detention.
6. I have not been given a meaningful explanation for why I continue to be detained.
7. I remain in custody without having had any judicial review of my detention.
8. This prolonged detention is causing me significant hardship and distress.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 04/01/2026

Signature:  BA

[Date]

Clerk of Court
United States District Court
Southern District of California
333 W. Broadway, Suite 420
San Diego, CA 92101

RE: EMERGENCY HABEAS CORPUS PETITION

Petitioner: Berman Jose Sobalvarro Sombarriba



Dear Clerk of Court:

I am currently detained at Imperial Regional Detention Facility in Calexico, California.

Enclosed for filing please find the following documents:

1. Emergency Petition for Writ of Habeas Corpus (28 U.S.C. § 2241)
2. Emergency Motion to Expedite
3. Proposed Order
4. Declaration of Petitioner

This is an emergency matter. I have been detained since approximately October 1, 2025, and have not been brought before an immigration judge or received any hearing.

I respectfully request that this matter be filed and brought to the attention of the Court as soon as possible.

Please file these documents and assign a case number.

Thank you for your time and attention to this urgent matter.

Respectfully submitted,


Berman Jose Sobalvarro Sombarriba


Petitioner (Pro Se)

Imperial Regional Detention Facility
Calexico, California