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

13 **SABBIR HOSSAIN RAFIK ULLAH,**

No.: 26-cv-2165-CAB-DDL

14 **Petitioner,**

15 **v.**

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

19 **Respondents.**

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, Petitioner explained that he is an asylum seeker
2 who has been subject to prolonged detention since he arrived in the U.S. In its
3 return, the government “concedes that this Court should order that Petitioner
4 receive a bond hearing, where the government would bear the burden of proof of
5 establishing, by clear and convincing evidence, that Petitioner poses a danger to
6 the community or a risk of flight.” Dkt. 9 at 1. Thus, this Court should grant the
7 petition and order at a minimum that Mr. Rafik Ullah receive a bond hearing.

8 Respectfully submitted,

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10 Dated: April 30, 2026

s/ Kara Hartzler

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