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6 UNITED STATES DISTRICT COURT
7 SOUTHERN DISTRICT OF CALIFORNIA

8
9 Faizan ILTAF,

Case No.: 26-cv-02283-JLS-MMP

10 Petitioner-Plaintiff,

11 v.

**PETITIONER'S TRAVERSE
SUPPORTING PETITION FOR WRIT
OF HABEAS CORPUS**

12 Jeremy CASEY, et al.

13 Respondents-Defendants.
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1 Petitioner Faizan Iltaf replies to Respondents' Return, stating as follows:

2 Petitioner acknowledges that the Respondents concede that a bond hearing with the
3 burden on the Government is the remedy here, and the Petitioner is of course in agreement
4 with this and respectfully requests the Court issue an Order to this effect. The Petitioner
5 does, however, wish to respond to the Respondents' assertion that "Petitioner claim fails to
6 take into account that several continuances of his removal proceedings were done at his
7 request." (See Docket 4, p. 1, lines 22-25.) The Petitioner did set forth in the Petition that
8 continuances were requested and that the vast majority of these continuances on the side of
9 Petitioner was due to having to obtain new counsel (after the first attorney provided
10 ineffective assistance) and then also due to the severe illness of his next pro bono counsel –
11 all factors outside of Petitioner's control. (See Docket 1, pp. 15-16.) The Petition also sets
12 forth how this is also only one of the *Kydyrali v. Wolf*, 499 F. Supp. 3d 768 (S.D. Cal. 2020),
13 factors and that five (if not all six) factors fall in favor of granting the Petitioner a bond
14 hearing – especially the length of detention which now exceeds 17 months.
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16 For these reasons, the Petitioner respectfully requests this Court order Petitioner to
17 have a bond hearing in which the burden is on the Government to show by clear and
18 convincing evidence that the Petitioner is a danger to the community or such a flight risk that
19 no amount of bond is appropriate.

20 Dated: April 27, 2026,

21 By: /s/ Kirsten Zittlau
22 Kirsten Zittlau
23 Attorney for Petitioner
24 Email: zittlaulaw@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2026, I caused the foregoing document to be electronically filed with the Clerk of the Court for the United States District Court for the Southern District of California by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

Executed on: April 27, 2026

/s/ Kirsten Zittlau
Kirsten Zittlau