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

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No.: 26-cv-2261-JLS-SBC

13 v.
14 MARKWAYNE MULLIN, Secretary of
15 the Department of Homeland Security, et
16 al.
17 Respondents.

Traverse in support of
petition for writ of
habeas corpus

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

1 In his amended petition, Mr. Saidaliev explained that he is a citizen of
2 Uzbekistan who was paroled into the United States to apply for asylum. But two
3 years later, ICE told Mr. Saidaliev to come in for a check in appointment and then
4 arrested him without any notice or explanation

5 In their return, Respondents state that “the government does not oppose the
6 petition and defers to the Court on the appropriate relief.” Dkt. 9 at 2–3. Because
7 Mr. Saidaliev’s claim involved the unlawful revocation of his parole, the correct
8 remedy is for the Court to order his release, rather than a bond hearing.¹ Thus, this
9 Court should grant the petition and order Mr. Saidaliev’s immediate release.

10 Respectfully submitted,

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12 Dated: May 11, 2026

s/ Kara Hartzler

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Attorneys for Petitioner
Email: kara_hartzler@fd.org

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26 ¹ See, e.g., *Arias v. Larose*, No. 3:25-CV-02595-BTM-MMP, 2025 WL 3295385,
27 at *3 (S.D. Cal. Nov. 25, 2025); *Noori v. LaRose*, No. 25-cv-1824-GPC-MSB,
28 2025 WL 2800149 (S.D. Cal. Oct. 1, 2025); *Salazar v. Casey*, No. 25-cv-2784
JLS-VET, 2025 WL 3063629 (S.D. Cal. Nov. 3, 2025); *Perez v. LaRose*, No. 25-
cv-02620-RBM-JLB, 2025 WL 3171742 (S.D. Cal. Nov. 13, 2025); *Y-Z-L-H v.*
Bostock, No. 25-cv-965-SI, 2025 WL 1898025, at *13 (D. Or. July 9, 2025).