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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 LUIS CRUZ-RIVAS,
11
12 Petitioner,

13 v.

14 MARKWAYNE MULLIN, Secretary of
the Department of Homeland Security,
15 TODD BLANCHE, Acting Attorney
General, TODD M. LYONS, Acting
16 Director, Immigration and Customs
Enforcement, JESUS ROCHA, Acting
17 Field Office Director, San Diego Field
Office, JEREMY CASEY, Warden of
18 Imperial Regional Detention Facility,

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20 Respondents.
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CASE NO.: 26-cv-2310-BJC-MMP

Traverse

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

1 In its return, the government does “not oppose the Court ordering a bond
2 hearing on this petition.” Doc. 8 at 2-3.

3 Mr. Cruz-Rivera thus requests that this Court immediately grant his habeas
4 petition. As noted in his petition, he requests that the Court release him
5 immediately from custody. Or, at a minimum, Mr. Cruz-Rivera requests that the
6 Court order a bond hearing before an immigration judge where at a minimum:

7 (1) the government shall bear the burden of establishing by clear and
8 convincing evidence that Petitioner poses a danger or flight risk, while
9 further specifying that concerns about interrupting court schedules is
10 not a ground to deny bond; and

11 (2) The IJ shall consider alternative conditions of release and Petitioner’s
12 ability to pay bond if he or she determines bond is appropriate.

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14 Respectfully submitted,

15 Dated: May 11, 2026

16 *s/ Zandra Luz Lopez*

17 **ZANDRA LUZ LOPEZ**

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20 Counsel for Petitioner
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