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

13 HENRY ATUD MBAH,
14
15 Petitioner,

16 v.

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

20 Respondents.

No.: 26-cv-2407-LL-MSB

Traverse in support of
petition for writ of
habeas corpus

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

1 In his amended petition, Mr. Mbah explained that he is a citizen of
 2 Cameroon who was accused of being a member of a separatist party and fled for
 3 his life. He was paroled into the United States on January 3, 2022, and applied for
 4 asylum before USCIS. But on October 7, 2025, ICE told Mr. Mbah to come in for
 5 a credible fear interview and then arrested him. ICE then took him into custody
 6 without any notice or explanation.

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

12 Respectfully submitted,

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 14 Dated: May 1, 2026

s/ Kara Hartzler

Federal Defenders of San Diego, Inc.

Attorneys for Petitioner

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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).