

1 Janice Deaton (CBN 135188)
2 Jdeaton@immdef.org
3 IMMIGRANT DEFENDERS LAW CENTER
4 634 S. Spring. St. 10th Floor
5 Los Angeles CA 90014
6 Telephone: (613) 768-7134

7 *Attorneys for the Petitioner*

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 Edmond Louis,

11 Petitioner,

12 vs.

13
14 CHRISTOPHER J. LAROSE, Senior
15 Warden of Otay Mesa Detention Center,
16 *et. al.* acting in their official capacities,
17 Respondents.

CASE NO. 26-cv-02450-CAB-BLM

**PETITIONER'S TRAVERSE IN
SUPPORT OF WRIT OF HABEAS
CORPUS**

Challenge to Unlawful Incarceration;
Request For Declaratory and Injunctive
Relief

18 On April 17, 2026, Mr. Louis filed a petition for a Writ of Habeas Corpus.

19
20 DOC 1. On April 24, 2026, Respondents filed their Response to Petition, where
21 they acknowledge that Petitioner is detained under 8 U.S.C. §§ 1225(b)(2)(A) or
22 1226(a) and is entitled to an order from this Court directing a bond hearing be held
23 pursuant to 8 U.S.C. § 1226(a), and state that they do not oppose the petition and
24 defer to the Court on the appropriate relief. (DOC 4). Mr. Louis greatly appreciates
25 Respondent's prompt Return and reiterates his request for his release from custody
26
27
28

1 forthwith under the same conditions of parole he had prior to his illegal arrest and
2 detention.¹
3

4 **PRAYER FOR RELIEF**

5
6 Given that the U.S. Attorney's office has conceded this issue is similar cases
7 with similarly situated Petitioners, and coupled with the vacating of *Yajure*
8 *Hurtado* on February 18, 2026, Mr. Louis respectfully requests that this
9

10 Court:

11 1. Issue a Writ of Habeas Corpus ordering Respondents to release Mr. Louis
12 from custody forthwith under the same conditions of parole he had prior to his
13 illegal arrest and detention;
14

15 2. Award Mr. Louis's counsel reasonable attorney's fees (of no more than
16 \$4,000.00) and costs under the Equal Access to Justice Act, and on any other
17 basis justified under law;
18

19 ///

20 ///

21 ///

22 ///

25 ¹ ICE has been sending letters to released Habeas Petitioners to appear at check-ins
26 and ordering conditions of recognizance that exceed the conditions imposed prior
27 to the detention of the petitioner.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. Grant such further relief as the Court deems just, equitable, and appropriate.

Date: April 24, 2026

Respectfully Submitted,

/s/ Janice Deaton
IMMIGRANT DEFENDERS
634 S. Spring. St. 10th Floor
Los Angeles CA 90014
Telephone: (613) 768-7134
jdeaton@immdef.org
Attorney for Petitioner