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

YUXING GAO,

Petitioner,

v.

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

Respondents.

No.: 26-cv-2671-BAS-AHG

**Traverse in support of
petition for writ of
habeas corpus**

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

1 In her amended petition, Ms. Gao explained that she is a citizen of China
2 who was paroled into the United States in 2023 so that she could seek asylum in
3 the United States. She submitted a timely asylum application, attended all her
4 check in appointments, and has no criminal history. But on July 26, 2025, ICE
5 arrested Ms. Gao and took her into custody with no notice or explanation.

6 In their return, Respondents state that they are “unable to ascertain
7 sufficient facts at this time to establish that Petitioner’s supervised release was
8 revoked according to the procedures established by law” and “acknowledge that
9 Petitioner is entitled to be released from custody subject to conditions of
10 supervision.” ECF 11 at 2. Thus, this Court should grant the petition and order
11 Ms. Gao’s immediate release.

12 Respectfully submitted,

13
14 Dated: May 15, 2026

s/ Kara Hartzler

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