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

12 SAMUEL MATEO-JUAN,
13 Petitioner,

14 v.

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

No.: 26-cv-2790-BJC-VET

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

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

1 In his amended petition, Mr. Mateo-Juan explained that he is a citizen of
2 Guatemala who was paroled into the United States to allow him to apply for
3 asylum. before USCIS. But despite complying with all his court dates and timely
4 submitting an application for relief, Mr. Mateo-Juan was arbitrarily detained in
5 violation of the regulations and taken into custody without any notice or
6 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. 9 at 2. Because
9 Mr. Mateo-Juan’s claim involved the unlawful revocation of his parole, the
10 correct remedy is for the Court to order his release, rather than a bond hearing.¹
11 Thus, this Court should grant the petition and order Mr. Mateo-Juan’s immediate
12 release.

13 Respectfully submitted,

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15 Dated: May 26, 2026

s/ Kara Hartzler
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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).