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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11 PEDRO PABLO PICADO TALAVERA,

CASE NO.: 26-cv-2744-BJC-GC

12 Petitioner,

Traverse

13 v.

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

14 JEREMY CASEY, Warden,

15 Respondent.
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18 In its Return, “the government does not oppose the petition and defers to
19 the Court on the appropriate relief.” ECF 5 at 3. The government then deferred to
20 the Court as to the appropriate remedy.

21 When an immigrant’s parole is unlawfully revoked, the remedy is
22 *immediate release, not a bond hearing*. See, e.g., *Teran v. Casey*, No. 26-CV-
23 1205 JLS (DEB), 2026 WL 710576, at *3 (S.D. Cal. Mar. 13, 2026) (ordering
24 immediate release on conditions of his preexisting parole); *Arias v. Larose*, No.
25 3:25-CV-02595-BTM-MMP, 2025 WL 3295385, at *3 (S.D. Cal. Nov. 25, 2025)
26 (“The Respondents shall immediately release Arias from custody on her
27 preexisting conditions.”); *Noori v. LaRose*, 807 F. Supp. 3d 1146, 1154 (S.D. Cal.
28 2025) (“order[ing] his immediate release”); *Salazar v. Casey*, No. 25-cv-2784

1 JLS-VET, 2025 WL 3063629 (S.D. Cal. Nov. 3, 2025) (ordering that ICE
2 “immediately release Petitioner from custody subject to the conditions of her
3 preexisting parole and Form I-94”); *Perez v. LaRose*, No. 25-cv-02620-RBM-
4 JLB, 2025 WL 3171742 (S.D. Cal. Nov. 13, 2025) (ordering respondents “to
5 immediately release Petitioner from custody, subject to the conditions of his
6 preexisting parole and Form I-94”); *Y-Z-L-H v. Bostock*, No. 25-cv-965-SI, 2025
7 WL 1898025, at *13 (D. Or. July 9, 2025) (ordering respondents “immediately to
8 release Petitioner from custody”).

9 Thus, this Court should grant the petition and order Petitioner’s immediate
10 release.

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Respectfully submitted,

Dated: May 19, 2026

s/ Zandra Lopez
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