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**Katie Hurrelbrink**  
Bar No. 325632  
Federal Defenders of San Diego, Inc.  
225 Broadway, Suite 900  
San Diego, California 92101-5030  
Telephone: (619) 234-8467  
Facsimile: (619) 687-2666  
Katie\_Hurrelbrink@fd.org

Attorneys for Mr. Jean Romain

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

ZADY GBADGNI JEAN ROMAIN,  
  
Petitioner,  
  
v.  
  
JEREMY CASEY, Warden at Imperial  
Regional Detention Center,  
  
Respondents.

CIVIL CASE NO.: 26-cv-2745-LL

**Traverse in Support of  
Petition for a Writ  
Of Habeas Corpus**

Because the government concedes that the petition should be granted, this Court should do so forthwith.

Respectfully submitted,

Dated: May 18, 2026

/s/ Katie Hurrelbrink

KATIE HURRELBRINK  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Jean Romain  
Email: katie\_hurrelbrink@fd.org