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

11 MOHAMMAD HASAM BILAL,
 12 Petitioner,
 13 v.
 14 MARKWAYNE MULLIN, Secretary of
 15 the Department of Homeland Security, et
 16 al.
 17 Respondents.

No.: 26-cv-2819-DMS-SBC

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

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

1 In his amended petition, Mr. Bilal explained that he is a citizen of Pakistan
2 who was granted withholding of removal in 2003. But on March 1, 2026, when he
3 was helping a friend move to Arizona and went through an immigration
4 checkpoint, immigration officials arrested him.

5 In its response, Respondents state that they are “unable to ascertain
6 sufficient facts at this time to establish that there is a significant likelihood of
7 removal in the reasonably foreseeable future” and thus “acknowledge that
8 Petitioner is entitled to be released from custody subject to conditions of
9 supervision.” Dkt. 4 at 1. Thus, this Court should grant the petition and order
10 Mr. Bilal’s immediate release.

11 Respectfully submitted,

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13 Dated: May 11, 2026

s/ Kara Hartzler
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