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

11 Aureliano Arrazola,

12 Petitioner,

13 v.

14 Christopher J. LAROSE, in his official  
15 capacity as Warden of Otay Mesa  
16 Detention Center; Patrick DIVVER, in his  
17 official capacity as San Diego Field  
18 Office Director, ICE Enforcement and  
19 Removal Operations; Markwayne  
20 MULLIN, in his official capacity as  
21 Secretary of Homeland Security; U.S.  
22 Department of Homeland Security; Todd  
23 BLANCHE, in his official capacity as  
24 Acting U.S. Attorney General; Executive  
25 Office for Immigration Review,

26 Respondents.

Case No.: 26-cv-02852-DMS-BJW

Agency File No.:



**PETITIONER'S TRAVERSE**

1 Petitioner Aureliano Arrazola provides this Traverse to Respondents'  
2 Return, in which Respondents acknowledge prior orders from this District  
3 directing bond hearings pursuant to 8 U.S.C. § 1226(a) in cases similar to  
4 Petitioner's. Respondents accordingly state that they do not oppose an order from  
5 this Court directing a bond hearing pursuant to 8 U.S.C. § 1226(a), which they  
6 request 14 days to provide.  
7

8 Respondents' concession does not moot Petitioner's primary claim for  
9 release from custody. Petitioner respectfully contends that the Court should order  
10 his immediate release rather than a bond hearing, as he has been unlawfully  
11 deprived of his right to a bond hearing while detained. Continued  
12 detention—particularly for an additional 14 days—would perpetuate the very  
13 violation habeas relief is meant to cure.  
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15

16 Accordingly, the Court should order Petitioner's immediate release from  
17 custody.  
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19 Dated: May 12, 2026

Signature: /s/ Robin M. Nagele  
By: Robin M. Nagele  
Attorney for Petitioner