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8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10 NAJMEDIN MASAR ZAKARIA,

11 Petitioner,

12 v.

13 CHRISTOPHER LAROSE, warden of
14 Otay Mesa Detention Center;

15 U.S. IMMIGRATION AND CUSTOMS
16 ENFORCEMENT;

17 Respondents.

Case No.: 3:26-cv-02751-BJC-MMP

**TRAVERSE TO FIRST AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS**

18 Petitioner, NAJMEDIN MASAR ZAKARIA, responds to this court as follows:

19 Respondents have no objection to this court ordering a bond hearing in response to
20 the petition.
21

22 WHEREFORE, Petitioner Prays the Court:

- 23 1. Grant the Petition and declare the continued detention of Mr.
24 Zakaria without a tenable justification a violation of the Due Process

1 Clause of the U.S. Constitution;

2 2. Order a bond hearing where the Respondents have the burden to show
3 by clear and convincing evidence that Mr. Zakaria is either an extreme
4 flight risk or a danger to the community;

5 3. Grant any other relief that may be fit and proper.

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7 Dated: July 20, 2026

Respectfully submitted,

8 By: /s/ Brian J. McGoldrick
9 Brian J. McGoldrick, Esq.
10 Attorney for Petitioner
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CERTIFICATE OF SERVICE

I, Brian J. McGoldrick, CERTIFY

I am over the age of 18 and not a party to this matter. My business address is 4916 Del Mar Avenue, San Diego, CA 92107. On July 20, 2026, I served a copy of this

TRAVERSE TO FIRST AMENDED PETITION FOR WRIT OF HABEAS CORPUS

by the method and to the parties listed below:

On July 20, 2026, I accessed the electronic mailing list for CM/ECF users in this case and representatives of all parties are CM/ECF users and are noticed as follows:

- **U S Attorney CV**
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- **Michael Damon Wallace**
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/s/Brian J. McGoldrick
Brian J. McGoldrick, Esq.
Counsel for Respondent