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

12 **QUINONEZ DE LA CRUZ HENNER,**

13 Petitioner,

14 v.

15 **MARKWAYNE MULLIN, Secretary of**  
16 **the Department of Homeland Security, et**  
17 **al.**

18 Respondents.

No.: 26-cv-2849-LL-BJW

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

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

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1 In his amended petition, Mr. de la Cruz henner explained that he is a citizen  
2 of Ecuador who lost his parents at a young age and fled for his life. He was  
3 paroled into the United States on March 20, 2024, and was applying for asylum in  
4 removal proceedings. But on December 12, 2025, masked plainclothes ICE agents  
5 surrounded Mr. de la Cruz Henner’s car, grabbed him, and arrested him without  
6 any notice or explanation.

7 In their return, Respondents state that “the government does not oppose the  
8 petition and defers to the Court on the appropriate relief.” ECF 6 at 3. Because  
9 Mr. de la Cruz Henner’s claim involved the unlawful revocation of his parole, the  
10 correct remedy is for the Court to order his release, rather than a bond hearing.<sup>1</sup>  
11 Thus, this Court should grant the petition and order Mr. de la Cruz Henner’s  
12 immediate release.

13 Respectfully submitted,

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15 Dated: June 1, 2026

*s/ Kara Hartzler*

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26 <sup>1</sup> See, e.g., *Arias v. Larose*, No. 3:25-CV-02595-BTM-MMP, 2025 WL 3295385,  
27 at \*3 (S.D. Cal. Nov. 25, 2025); *Noori v. LaRose*, No. 25-cv-1824-GPC-MSB,  
28 2025 WL 2800149 (S.D. Cal. Oct. 1, 2025); *Salazar v. Casey*, No. 25-cv-2784  
JLS-VET, 2025 WL 3063629 (S.D. Cal. Nov. 3, 2025); *Perez v. LaRose*, No. 25-  
cv-02620-RBM-JLB, 2025 WL 3171742 (S.D. Cal. Nov. 13, 2025); *Y-Z-L-H v.*  
*Bostock*, No. 25-cv-965-SI, 2025 WL 1898025, at \*13 (D. Or. July 9, 2025).