

Kara Hartzler
Cal. Bar No. 293751
Federal Defenders of San Diego, Inc.
225 Broadway, Suite 900
San Diego, California 92101-5030
Telephone: (619) 234-8467
Facsimile: (619) 687-2666
Kara_hartzler@fd.org

Attorneys for Petitioner

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

JOSE ISMAEL SORIANO AMAYA,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of
the Department of Homeland Security, et
al.

Respondents.

No.: 26-cv-2902-LL-JLB

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

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

1 Mr. Soriano Amaya is a citizen of El Salvador who was paroled into the
 2 United States on January 30, 2024, and was applying for asylum in removal
 3 proceedings. But on January 22, 2026, plainclothes ICE agents pulled Mr. Soriano
 4 Amaya's car over and arrested him without any notice or explanation, in violation
 5 of the regulations and due process.

6 In their return, Respondents state that "the government does not oppose the
 7 petition and defers to the Court on the appropriate relief." ECF 6 at 3. Because
 8 Mr. Soriano Amaya's claim involved the unlawful revocation of his parole, the
 9 correct remedy is for the Court to order his release, rather than a bond hearing.¹
 10 Thus, this Court should grant the petition and order Mr. Soriano Amaya's
 11 immediate release.

12 Respectfully submitted,

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 14 Dated: June 8, 2026

s/ Kara Hartzler

Federal Defenders of San Diego, Inc.
 Attorneys for Petitioner
 Email: kara_hartzler@fd.org

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 26 ¹ 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).