

1 Jenn French, State Bar No. 265422
jenn@frenchlawapc.com
2 **JENNIFER M. FRENCH, APC**
1050 University Ave., Ste. E107-80
3 San Diego, CA 92103
Telephone: 858.205.4119

4 *Pro Bono Attorney for Petitioner*
5
6
7

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

12 **VICTOR (VICKY) ALFONSO**
13 **VELAZQUEZ VELAZQUEZ,**

14 **Petitioner,**

15 **vs.**

16 **CHRISTOPHER J. LAROSE, Warden,**
17 **Otay Mesa Detention Center; DANIEL**
18 **A. BRIGHTMAN, Field Office Director,**
19 **San Diego Field Office, United States**
20 **Immigration and Customs Enforcement;**
21 **TODD M. LYONS, Acting Director,**
United States Immigration and Customs
Enforcement; MARKWAYNE
MCMULLIN, Secretary of Homeland
Security; TODD BLANCHE, Acting
Attorney General, in their official
capacities,

22 **Respondents.**
23
24
25
26
27
28

Case No.: 3:26-cv-03108-RFL-SBC

TRAVERSE TO RETURN TO PETITION
FOR WRIT OF HABEAS CORPUS

1 In their return, Respondents concede that this Court has routinely granted the relief
2 sought in cases that are “not materially distinguishable” to hers. Petitioner Velazquez rests
3 on her original petition and asks that this Court grant her requested relief—including
4 release from detention—as soon as practicable.

5 Dated: May 26, 2026

Respectfully submitted,

6 By: /s/ Jenn French
7 Pro Bono Attorney for Petitioner
8 Email: jenn@frenchlawapc.com
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28