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5 **UNITED STATES DISTRICT COURT**
SOUTHERN DISTRICT OF CALIFORNIA
6 **SAN DIEGO**

7 J.E.,
Petitioner,

Case No. 26-cv-3353-BAS-VET

8 v.

PETITIONER'S TRAVERSE

9 Todd Blanche, *et al.*,

10 Respondents.
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1 The Respondents have not meaningfully challenged the petition, and are
2 “unable to ascertain sufficient facts at this time to establish that Petitioner’s supervised
3 release was revoked according to the procedures established by law.” ECF No. 8.
4 Thus, the merits of the claims set forth at ¶¶ 42 – 55 of the Petition are conceded. *See*
5 *Soleimani v. Larose*, 2025 U.S. Dist. LEXIS 230910, 2025 WL 3268412, *3 (S.D.
6 Cal. 2025) (granting habeas petition where government’s response to the petition
7 failed to respond to numerous claims raised in the petition); *Singh v. Chiang*, 2025
8 WL 4058328, *4 (C.D. Cal. 2025) (construing government’s failure to oppose
9 argument raised by habeas petitioner as a concession); *Dilewar Singh v. Annex*, No.
10 26-cv-00440-FMO-AJR, Dkt. 9, 2026 U.S. Dist. LEXIS 27669 (C.D. Cal. Feb. 9,
11 2026) (granting petition where “the court construes respondents’ failure to address
12 petitioner’s due process claim as a concession of petitioner’s argument”).

13 Multiple district courts have found in favor of immediate release for petitioners
14 who were re-detained under the same or similar circumstances as Petitioner. ECF No.
15 1, ¶¶ 46 – 47.

16 Therefore, given Respondents’ lack of any meaningful challenge to his petition,
17 and the evidence of record that Petitioner’s ongoing re-detention is unlawful, he
18 respectfully requests immediate release to the same conditions before his unlawful
19 detention, without an ankle monitor or monitoring devise, and an order requiring the
20 government to follow proper statutes and regulations should it seek to re-detain
21 Petitioner in the future. *See* ECF No. 1, generally.

1 June 11, 2026

2 /s/ Leah L. Chavarria
3 Leah L. Chavarria
4 Counsel for Petitioner
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