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

7 Mayra Iliana AMBROCIO CORTES ,
Petitioner,

8 v.

9 Todd Blanche, *et al.*;

10 Respondents.
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Case No. 26-cv-03414-DMS-DDL

Agency No. 

PETITIONER'S TRAVERSE

1 The Respondents failed to respond to the merits of the allegations in the Petition
2 set forth at ¶¶ 36 – 41. *See also, generally*, ECF No. 1. Not opposing a bond hearing
3 does not respond to the petition. Thus, the merits of the claims set forth at ¶¶ 36 – 41
4 of the Petition are conceded. *See Soleimani v. Larose*, 2025 U.S. Dist. LEXIS 230910,
5 2025 WL 3268412, *3 (S.D. Cal. 2025) (granting habeas petition where government’s
6 response to the petition failed to respond to numerous claims raised in the petition);
7 *Singh v. Chiang*, 2025 WL 4058328, *4 (C.D. Cal. 2025) (construing government’s
8 failure to oppose argument raised by habeas petitioner as a concession); *Dilewar*
9 *Singh v. Annex*, No. 26-cv-00440-FMO-AJR, Dkt. 9, 2026 U.S. Dist. LEXIS 27669
10 (C.D. Cal. Feb. 9, 2026) (granting petition where “the court construes respondents’
11 failure to address petitioner’s due process claim as a concession of petitioner’s
12 argument”).

13 Therefore, given Respondents’ lack of any meaningful challenge to his petition,
14 Petitioner respectfully requests immediate release from detention. *See* ECF No. 1.

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16 /s/ Leah L. Chavarria

17 Leah L. Chavarria
18 *Counsel for Petitioner*
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