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

MARTHA ISABEL CAMACHO
RAMIREZ,

Petitioner,

v.

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

Respondents.

No.: 26-cv-3689-CAB-MSB

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

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

1 In her amended petition, Ms. Camacho Ramirez explained that she is a
2 citizen of Mexico who was paroled into the United States, submitted an
3 application for asylum, and complied with all her check in appointments. But on
4 February 24, 2026, Ms. Camacho Ramirez was stopped by Border Patrol agents
5 when she was driving on the freeway from Arizona to Los Angeles. They took her
6 into immigration custody and never explained why they were revoking her parole.

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 No. 9 at 2.
9 Because Ms. Camacho Ramirez’s claim involved the unlawful revocation of her
10 parole, the correct remedy is for the Court to order her release, rather than a bond
11 hearing.¹ Thus, this Court should grant the petition and order her immediate
12 release.

13 Respectfully submitted,

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15 Dated: July 20, 2026

s/ Kara Hartzler

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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).