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

13 **DICSON OBEL AGUILAR-**
14 **MAZARIEGOS,**

15 Petitioner,

16 v.

17 **MARKWAYNE MULLIN, Secretary of**
18 **the Department of Homeland Security, et**
19 **al.**

20 Respondents.

No.: 26-cv-3758-LL-AHG

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

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

1 In his amended petition, Mr. Aguilar-Mazariegos explained that he is a
2 citizen of Honduras who was paroled into the United States at age 16 to allow him
3 to apply for asylum. But despite complying with all his check ins and timely
4 submitting an application for relief, Mr. Aguilar-Mazariegos was stopped by ICE
5 on his way to work, told him that he was here “illegally,” and revoked their
6 decision to release him without any notice or explanation.

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. 6 at 3.
9 Because Mr. Aguilar-Mazariegos’s claim involved the unlawful revocation of his
10 parole, the correct remedy is for the Court to order his release, rather than a bond
11 hearing.¹ Thus, this Court should grant the petition and order his immediate
12 release.

13 Respectfully submitted,
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15 Dated: July 23, 2026

s/ Kara Hartzler

Federal Defenders of San Diego, Inc.

Attorneys for Petitioner

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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).