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Attorneys for Mr. Rivera-Gonzalez

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

JESUS JULIAN RIVERA-GONZALEZ,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of
the Department of Homeland Security,
TODD BLANCHE, Acting Attorney
General, **TODD M. LYONS**, Acting
Director, Immigration and Customs
Enforcement, **JESUS ROCHA**, Acting
Field Office Director, San Diego Field
Office, **CHRISTOPHER LAROSE**,
Warden at Otay Mesa Detention Center,

Respondents.

Case No.: 26-cv-3814-CAB-BJW

Traverse

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

1 In his habeas petition, Mr. Rivera-Gonzalez explained that he was granted
2 withholding of removal in 2011 and has lived in the United States since. He is
3 entitled to immediate release under *Zadvydas v. Davis*, 533 U.S. 678 (2001)
4 because there is no significant likelihood of release in the reasonably foreseeable
5 future. ECF 1. In its Return, the government states it is “unable to ascertain
6 sufficient facts at this time to establish that there is a significant likelihood of
7 removal in the reasonably foreseeable future.” ECF 5. Thus, it acknowledges that
8 “Petitioner is entitled to be released from custody subject to conditions of
9 supervision.” *Id.*

10 Thus, this Court should grant the petition and order Petitioner’s immediate
11 release.

12 Respectfully submitted,

13
14 Dated: July 9, 2026

s/ Hannah Pineiro Basalone

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