

1 Leah L. Chavarria, Esq.  
CA Bar # 297506  
2 2251 San Diego Ave., STE B-200  
San Diego, CA 92110  
3 leah@hurwitzholt.com  
Attorney for Petitioner  
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5 **UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**  
6 **SAN DIEGO**

7 Jose Israel FRANCO GUZMAN,

Case No. 26-cv-03837-GPC-MSB

8 Petitioner,

9 v.

10 Attorney General of the United States,  
Department of Justice; *et al.*,

**PETITIONER'S TRAVERSE**

11 Respondents.  
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1 While the Respondents did not meaningfully address each of Petitioner's  
 2 arguments related to violations of the Fourth Amendment (ECF No. 4, at 2)<sup>1</sup>, given that  
 3 Respondents "acknowledge the prior orders from this District directing bond hearings  
 4 pursuant to 8 U.S.C. § 1226(a)" and "do not oppose an order from this Court directing  
 5 a bond hearing be held pursuant to 8 U.S.C. § 1226(a)", Petitioner requests this court  
 6 make the decision that will give him the swiftest result as his greatest desire is to be  
 7 released from unlawful custody at the earliest possible moment. Petitioner's family is  
 8 in great need for his continued financial support through his longtime employment in  
 9 the U.S. meat industry.

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 12 Dated: July 10, 2026

Respectfully submitted,

13 /s/ Leah L. Chavarria  
 14 Leah L. Chavarria  
 Counsel for Petitioner

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 16 <sup>1</sup> The merits of the claims set forth at ¶¶ 28-35 of the Petition (ECF No. 1) should be  
 17 considered to be conceded. *See Soleimani v. Larose*, 2025 U.S. Dist. LEXIS 230910,  
 18 2025 WL 3268412, \*3 (S.D. Cal. 2025) (granting habeas petition where government's  
 19 response to the petition failed to respond to numerous claims raised in the petition);  
 20 *Singh v. Chiang*, 2025 WL 4058328, \*4 (C.D. Cal. 2025) (construing government's  
 21 failure to oppose argument raised by habeas petitioner as a concession); *Dilewar Singh*  
*v. Annex*, No. 26-cv-00440-FMO-AJR, Dkt. 9, 2026 U.S. Dist. LEXIS 27669 (C.D. Cal.  
 Feb. 9, 2026) (granting petition where "the court construes respondents' failure to  
 address petitioner's due process claim as a concession of petitioner's argument"). If not  
 considered to be conceded by this Court, Petitioner requests this Court issue a decision  
 directing a bond hearing in line with the considerable number of cases finding such in  
 this District.