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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JONNATHAN ADRIAN ALLAICO
LLIGUICOTA,

Petitioner,

v.

WARDEN OF IMPERIAL REGIONAL
DETENTION FACILITY, et al.,

Respondents.

Civil Action No. 3:26-cv-04131-JO-MMP

Immigration No. 

TRAVERSE

Respondents have acknowledged that “this Court’s prior decisions will control the result here if the Court adheres to its prior decisions, as the facts are not materially distinguishable for purposes of the Court’s decision” and have stated that “on that basis the government does not oppose the petition and defers to the Court on the appropriate relief.” (ECF No. 4 at 3). As such, Petitioner submits that this matter may be decided without a hearing, and that, given Petitioner is not a danger to the community and is not a flight risk, and was previously released “on conditional parole issued under 8 U.S.C. § 1226(a)” (ECF No. 4 at 2) before being arbitrarily re-detained without due process, the appropriate remedy here would be the issuance of an Order requiring Petitioner’s immediate release from custody, with all personal property and

1 identification documents that were in his possession upon being detained.

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3 Dated: July 28, 2026

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Respectfully Submitted,

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/s/ Kurt R. Saccone

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