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10 Counsel for Petitioner

11
12 **UNITED STATES DISTRICT COURT FOR THE**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 Alberto PERDOMO RIVERA;

15 Petitioner,

16 v.

17 Markwayne MULLIN, Secretary,
18 Department of Homeland Security; Todd
19 LYONS, in his official capacity as Acting
20 Director of U.S. Immigration and Customs
21 Enforcement; Todd BLANCHE, Acting
22 Attorney General of the United States; Andre
23 QUINONES, Director, Los Angeles ICE
24 Field Office; and Fereti SEMAIA, Warden,
25 Adelanto ICE Processing Center,

26 Respondents.

No. 5:26-cv-04197-KES

PETITIONER'S TRAVERSE

Honorable Karen E. Scott
United States Magistrate Judge

1 Petitioner hereby submits his traverse in response to Respondents' answer to
2 his petition for habeas corpus. Dkt #9.

3 While Respondents are correct that Petitioner is entitled to a bond hearing
4 pursuant to *Rodriguez Vazquez v. Bostock*, --- F.4th ---, 2026 WL 2196424 (9th Cir.
5 2026), this does not absolve Respondents of the requirements to comply with the
6 statute and regulations when arresting Petitioner. Respondents offer no response in
7 opposition to Count I of the Petition. Dkt. # 1 at 5.

8 Based on the warrantless arrest without probable cause that Petitioner was a
9 flight risk, which Respondents do not contest, immediate release from immigration
10 detention is required by law. *Urias v. Semaia*, No. 5:26-CV-02753-DTB, 2026 WL
11 1710375, at *6 (C.D. Cal. June 10, 2026); *Galvez Pantoja v. DHS*, No. 5:26-CV-
12 02084-JDE, 2026 WL 1601897, at *4 (C.D. Cal. June 1, 2026); *Navarro Gomez v.*
13 *Wofford*, No. 1:26-CV-05299 (VC), 2026 WL 2065708, at *3 (E.D. Cal. July 16,
14 2026); *Gregorio v. Larose*, No. 3:26-CV-03918-RBM-SBC, 2026 WL 2059095, at
15 *1 (S.D. Cal. July 16, 2026) *Ahmed M. v. Bondi*, No. 25-CV-4711 (ECT/SGE), 2026
16 WL 25627, at *3 (D. Minn. Jan. 5, 2026); *Lopez-Sanchez v. Blanche*, No.
17 8:26CV264, 2026 WL 1759557, at *3 (D. Neb. June 18, 2026); *Chiliquinga*
18 *Yumbillo v. Stamper*, No. 2:25-cv-00479-SDN, 2025 WL 2783642, at *5 (D. Me.
19 Sept. 30, 2025); *J.A.C.P. v. Wofford*, No. 1:25-cv-01354-KES-SKO (HC), 2025 WL
20 3013328, at *8 (E.D. Cal. Oct. 27, 2025).

21 Dated: August 5, 2026

Respectfully submitted,

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23 By: /s/ Megan Brewer
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