

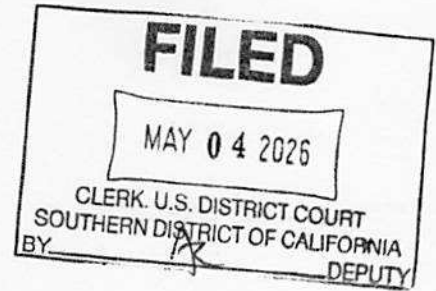
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BERMAN JOSE SOBALVARRO SOMBARRIBA,
Petitioner,

v.

WARDEN, Imperial Regional Detention Facility, et al.,
Respondents.

Case No. 3:26-cv-02238-RBM-DDL



PETITIONER'S REPLY TO RESPONDENTS' RETURN

Petitioner respectfully submits this Reply to Respondents' Return.

Petitioner has remained detained since October 2025 without a bond hearing or individualized custody determination.

Petitioner's removal order remains under appeal following the appeal filed on August 28, 2023. Removal to Nicaragua is not reasonably foreseeable, and Respondents have provided no evidence of travel documents, a scheduled removal date, or any imminent deportation timeline.

Respondents acknowledge that this Court and other courts within this district have repeatedly reached conclusions favorable to similarly situated detainees. Respondents further state that they do not oppose the Petition and defer to this Court regarding appropriate relief.

Petitioner respectfully submits that continued detention has become unreasonably prolonged and violates due process protections under the Fifth Amendment.

Petitioner respectfully requests that this Court grant the Petition and order appropriate relief, including release under reasonable conditions or an individualized custody hearing.

Respectfully submitted,

Berman Jose Sobalvarro Sombarriba

Date: April 24 2026

