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

SALVADOR ROMERO-RADILLA,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of
the Department of Homeland Security, et
al.

Respondents.

No.: 26-cv-2263-BAS-DDL

**Traverse in support of
petition for writ of
habeas corpus**

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

1 In his amended petition, Mr. Romero Radilla explained that he is an asylum
2 seeker who has been subject to prolonged detention since he arrived in the U.S. In
3 its return, the government “concedes that this Court should order that Petitioner
4 receive a bond hearing, where the government would bear the burden of proof of
5 establishing, by clear and convincing evidence, that Petitioner poses a danger to
6 the community or a risk of flight.” Dkt. 9 at 1–2. Thus, this Court should grant the
7 petition and order at a minimum that Mr. Romero Radilla receive a bond hearing.

8 Respectfully submitted,

9
10 Dated: April 28, 2026

s/ Kara Hartzler

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