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8
9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 Nebiyu Nure FUJAGA,

12 Petitioner,

13 v.
14

15 Jeremy CASEY, Warden, Imperial
16 Regional Detention Facility, *et al.*,

17 Respondents.
18
19

Case No.: 26-cv-02694-RBM-MSB

**TRAVERSE IN SUPPORT OF
PETITION FOR WRIT OF HABEAS
CORPUS**

20 Respondents concede, given this Court's prior rulings and the length of time
21 that Petitioner has been detained, "that this Court should order that Petitioner
22 receive a bond hearing where the government would bear the burden of
23 establishing, by clear and convincing evidence, that Petitioner poses a danger to
24 the community or a risk of flight." ECF No. 4.

25 In light of the government's position and for the reasons stated in the
26 petition, this Court should order Respondents to provide a prompt individualized
27 bond hearing before a neutral adjudicator at which the government bears the
28 burden by clear and convincing evidence to justify Petitioner's continued

1 detention. ECF No. 1. Petitioner respectfully requests that any resultant order by
2 this Court explicitly retains jurisdiction over this petition so that Petitioner will be
3 able to seek further relief therefrom should a subsequent bond hearing before an
4 immigration judge fail to comport with due process.

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6 Dated: May 13, 2026

Respectfully submitted,

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8 By: /s/ Zohaile Kakavand
9 Zohaile Kakavand
10 Casa Cornelia Law Center
11 *Pro Bono Counsel for Petitioner*
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