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

12 **VEYSI ARAS,**

13 Petitioner,

14 v.

15 TODD BLANCE, Acting Attorney
16 General, MARKWAYNE MULLIN,
17 Secretary of the Department of Homeland
18 Security, TODD M. LYONS, Acting
19 Director, Immigration and Customs
20 Enforcement, and CHRISTOPHER
21 LAROSE, Warden of the Otay Mesa
22 Detention Facility,

23 Respondents.

CIVIL CASE NO.: 26-cv-2821-LL

**Traverse in Support of
Petition for a Writ
of Habeas Corpus**

24 The government concedes that the petition should be granted. Third, when
25 an immigrant's parole is unlawfully revoked, the remedy is release, not a bond
26 hearing. *See, e.g., Arias v. Larose*, No. 3:25-CV-02595-BTM-MMP, 2025 WL
27 3295385, at *3 (S.D. Cal. Nov. 25, 2025) ("The Respondents shall immediately
28 release Arias from custody on her preexisting conditions."); *Noori v. LaRose*, 807
F. Supp. 3d 1146, 1154 (S.D. Cal. 2025) ("order[ing] his immediate release");
Salazar v. Casey, No. 25-cv-2784 JLS-VET, 2025 WL 3063629 (S.D. Cal. Nov.
3, 2025) (ordering that ICE "immediately release Petitioner from custody subject
to the conditions of her preexisting parole and Form I-94"); *Perez v. LaRose*, No.

1 25-cv-02620-RBM-JLB, 2025 WL 3171742 (S.D. Cal. Nov. 13, 2025) (ordering
2 respondents “to immediately release Petitioner from custody, subject to the
3 conditions of his preexisting parole and Form I-94”); *Y-Z-L-H v. Bostock*, No. 25-
4 cv-965-SI, 2025 WL 1898025, at *13 (D. Or. July 9, 2025) (ordering
5 respondents “immediately to release Petitioner from custody”). Thus, this Court
6 should order Mr. Aras’s immediate release from custody.
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Respectfully submitted,

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10 Dated: May 22, 2026

s/ Katie Hurrelbrink

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