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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JAMES MUSA GAMA,

Petitioner,

v.

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

Respondents.

Case No.: 26-cv-2868-BJC-SBC

Traverse

[28 U.S.C. § 2241]

1 In their return, Respondents “acknowledge that Petitioner is
2 entitled to be released from custody” under Zadvydas. ECF No. 4. They
3 agree with Mr. Gama that the proper remedy is “release[] from custody
4 subject to conditions of supervision” under 8 U.S.C. § 1231(a)(3). *Id.*

5 Respondents do not address or dispute Mr. Gama’s second claim
6 in his petition, that ICE failed to comply with due process and its own
7 regulations while re-detaining him. ECF No. 1 at 10–12. It also did not
8 respond to the third claim regarding third country removal. *Id.* at 13–
9 17.

10 This Court should thus grant Mr. Gama’s amended habeas
11 petition and order his requested relief, ECF No. 1 at 17–18.

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13 Respectfully submitted,

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15 Dated: May 13, 2026

s/ Zandra L. Lopez

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