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

KEVIN JOSUE ARANDA MARTINEZ,

Petitioner,

v.

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

Respondents.

No.: 26-cv-2905-JES-AHG

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

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

1 In his amended petition, Mr. Aranda Martinez explained that he is a citizen  
2 of Honduras who was paroled into the United States to apply for asylum. But on  
3 February 22, 2026, ICE arrested Mr. Aranda Martinez and took him into custody  
4 without any notice or explanation.

5 In its return, Respondents state that “the government does not oppose the  
6 petition and defers to the Court on the appropriate relief.” ECF 9 at 2. Because  
7 Mr. Aranda Martinez’s claim involved the unlawful revocation of his parole, the  
8 correct remedy is for the Court to order his release, rather than a bond hearing.<sup>1</sup>  
9 Thus, this Court should grant the petition and order Mr. Aranda Martinez’s  
10 immediate release.

11 Respectfully submitted,

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13 Dated: May 22, 2026

s/ Kara Hartzler  
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26 <sup>1</sup> See, e.g., *Arias v. Larose*, No. 3:25-CV-02595-BTM-MMP, 2025 WL 3295385,  
27 at \*3 (S.D. Cal. Nov. 25, 2025); *Noori v. LaRose*, No. 25-cv-1824-GPC-MSB,  
28 2025 WL 2800149 (S.D. Cal. Oct. 1, 2025); *Salazar v. Casey*, No. 25-cv-2784  
JLS-VET, 2025 WL 3063629 (S.D. Cal. Nov. 3, 2025); *Perez v. LaRose*, No. 25-  
cv-02620-RBM-JLB, 2025 WL 3171742 (S.D. Cal. Nov. 13, 2025); *Y-Z-L-H v.*  
*Bostock*, No. 25-cv-965-SI, 2025 WL 1898025, at \*13 (D. Or. July 9, 2025).