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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ALAM KHURSHAD,

Petitioner,

v.

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

Respondents.

CASE NO.: 26-cv-03133-DMS-MSB

Traverse

In his habeas petition, Petitioner explained that he is entitled to immediate release under *Zadvydas v. Davis*, 533 U.S. 678 (2001) because there is no significant likelihood of release in the reasonably foreseeable future. ECF 1. In its Return, the government states it is “unable to ascertain sufficient facts at this time to establish that there is a significant likelihood of removal in the reasonably foreseeable future.” ECF 5. Thus, it acknowledges that “Petitioner is entitled to be released from custody subject to conditions of supervision.” *Id.*

This Court should grant the petition and order Petitioner’s immediate release.

Respectfully submitted,

Dated: June 1, 2026

/s/ Zandra L. Lopez
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