

1 Michael L. Tusken, Esq. (CBN 175715)
2 LAW OFFICES OF MICHAEL L. TUSKEN
3 1510 W Whittier Blvd # 42
4 La Habra, CA 90631
5 Tel: (562) 365-9465
6 Fax: (562) 252-8529
7 Michael@TuskenLaw.com
8 Attorney for Petitioner

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

11 YUYING LIN

12 Petitioner,

13 v.

14 WARDEN OF IMPERIAL REGIONAL
15 DETENTION FACILITY; et al.,
16 MARKWAYNE MULLIN,
17 SECRETARY OF DEPARTMENT OF
18 HOMELAND SECURITY,

19 Respondents.

Case No.: 26-cv-3173-JLS-MMP

Hon. Janis L. Sammartino

**TRAVERSE TO RESPONDENTS'
RETURN TO PETITION FOR A
WRIT OF HABEAS CORPUS**

IN CUSTODY:

 (Alien Registration
Number)

20
21
22 The government has filed a non-opposition to Petitioner Yuying Lin's
23 ("Petitioner") Petition for Writ of Habeas Corpus. The government concedes therein
24 that the facts of the instant petition are not materially distinguishable from those in other
25 cases in which the Court has granted habeas petitions, and it further concedes that the
26 Court's prior decisions granting petitions on similar facts control.

27 Counsel respectfully suggests to the Court that the Petition should be granted,
28 and Petitioner ordered released from ICE custody forthwith, as his Honorable Court has

1 ordered in similar situations. Counsel respectfully avers that Petitioner's immediate
2 release is preferable to keeping her in custody for at least two weeks and ordering a
3 bond hearing before the immigration judge on account that the government indicates
4 that a bond hearing would require at least two weeks of additional unnecessary
5 detention.

6
7 Dated: May 29, 2026

Respectfully Submitted,

8 
9

10 MICHAEL TUSKEN
11 Attorney for Petitioner
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 1510 W. Whittier Blvd., #42, La Habra, CA 90631.

On the below date, I electronically filed the foregoing document entitled TRAVERSE TO RESPONDENTS' RETURN TO PETITION FOR A WRIT OF HABEAS CORPUS with the Clerk of the United States District Court for the Southern District of California, using the CM/ECF System.

The Court's CM/ECF System will send an email notification of the foregoing filings to the following parties and counsel of record who are registered with the Court's CM/ECF System:

Jacob Tyler Metzger
DOJ-USAO
Civil Division
880 Front Street
Room 6293
San Diego, CA 92101-8807
619-885-2119
Email: jacob.metzger@usdoj.gov

Counsel to Respondents
Warden of Imperial Regional Detention
Facility and Markwayne Mullin,
Secretary of Department of Homeland
Security

[X] (BY ELECTRONIC SERVICE VIA CM/ECF SYSTEM) In accordance with the electronic filing procedures of this Court, service has been effected on the aforesaid party(s) above, whose counsel of record is a registered participant of CM/ECF, via electronic service through the CM/ECF system.

[X] (FEDERAL) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 29, 2026, at Rowland Heights, California.

/s/ Michael L. Tusken
Michael L. Tusken