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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO

J.P.,
Petitioner,

v.

Todd Blanche, *et al.*,

Respondents.

Case No. 26-cv-03288-BAS-VET

PETITIONER'S TRAVERSE

Given that Petitioner has been re-detained in violation of law, seemingly without a warrant, Petitioner asks this Court to find that his continued detention is unlawful and that he must be released immediately. ECF No 1. The Respondents have not meaningfully challenged this assertion by Petitioner, or provided any evidence that Petitioner is rightfully detained in the first instance. *See generally* ECF No. 5. Respondents do assert that Petitioner is subject to mandatory detention (but does acknowledge the Court's prior decisions in that regard). ECF No. 5. Respondents failed to respond to the merits of the allegations in the Petition set forth at ¶¶ 38 – 50. *See also, generally*, ECF No. 1. Not opposing a bond hearing does not respond to the petition. Thus, the merits of the claims set forth at ¶¶ 38 – 50 of the Petition are conceded. *See Soleimani v. Larose*, 2025 U.S. Dist. LEXIS 230910, 2025 WL 3268412, *3 (S.D. Cal. 2025) (granting habeas petition where government's response to the petition failed to respond to numerous claims raised in the petition); *Singh v. Chiang*, 2025 WL 4058328, *4 (C.D. Cal. 2025) (construing government's failure to oppose argument raised by habeas petitioner as a concession); *Dilewar Singh v. Annex*, No. 26-cv-00440-FMO-AJR, Dkt. 9, 2026 U.S. Dist. LEXIS 27669 (C.D. Cal. Feb. 9, 2026) (granting petition where "the court construes respondents' failure to address petitioner's due process claim as a concession of petitioner's argument").

Multiple district courts have found in favor of immediate release for petitioners who were re-detained under the same or similar circumstances as Petitioner. ECF No. 1, ¶¶ 41 – 42.

Therefore, given Respondents' lack of any meaningful challenge to his petition, and the evidence of record that Petitioner's ongoing re-detention is unlawful, he respectfully requests immediate release to the same conditions before his unlawful detention, and an order requiring the government to follow proper statutes and regulations should it seek to re-detain Petitioner in the future. *See* ECF No. 1, generally.

June 10, 2026

/s/ *Leah L. Chavarria*
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Counsel for Petitioner