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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

KOUYABA BACHIROU,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of the Department of Homeland Security, PAMELA JO BONDI, Attorney General, TODD M. LYONS, Acting Director, Immigration and Customs Enforcement, JESUS ROCHA, Acting Field Office Director, San Diego Field Office, JEREMY CASEY, Warden at Imperial Regional Detention Facility,

Respondents.

Case No.: 26-cv-3322-BAS-MMP

Traverse in Support of Petition for a Writ of Habeas Corpus

On June 17, 2026, Kouyaba Bachirou filed an amended habeas petition arguing that his prolonged detention of now almost 18 months in immigration custody has violated the Due Process Clause of the Fifth Amendment. *See* Bachirou Amended Petition for Writ of Habeas Corpus, ECF No. 9. The government filed its response to Mr. Bachirou's petition on June 29, 2026. *See* Gov. Response, ECF No. 11. The government does not dispute any of the facts set forth in Mr. Bachirou's petition. *Id.* Moreover, the government concedes "that this Court should order that Petitioner receive a bond hearing, where the government

would bear the burden of proof of establishing, by clear and convincing evidence, that Petitioner poses a danger to the community or a flight risk." *Id.*

Thus, this Court should grant Mr. Bachirou's request for a bond hearing.

Respectfully submitted,

Dated: June 29, 2026

s/ Hannah Basalone

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