Jessie Agatstein
California Bar No. 319817
Federal Defenders of San Diego, Inc.
225 Broadway, Suite 900
San Diego, California 92101-5030
Telephone: (619) 234-8467
Facsimile: (619) 687-2666
Jessie_Agatstein@fd.org

Attorneys for Mr. Pardo Escobar

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

GLENN ARNALDO PARDO ESCOBAR,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of the Department of Homeland Security, TODD BLANCHE, Acting Attorney General, TODD M. LYONS, Acting Director, Immigration and Customs Enforcement, JESUS ROCHA, Acting Field Office Director, San Diego Field Office, CHRISTOPHER LAROSE, Warden of Otay Mesa Detention Center,

Respondents.

Case No.: 26-cv-3312-LL-DEB

Traverse in Support of Unopposed First Amended Petition for Writ of Habeas Corpus

In his First Amended Petition, Mr. Pardo Escobar explained that he received conditional parole under 8 U.S.C. § 1226 in October 2023, had complied with all his conditions, and had a pending asylum application. ECF No. 7. He thus explained that his immigration arrest on February 18, 2026, violated due process and requested his immediate release onto his existing parole conditions. *Id.*

In response, the government agrees that Mr. Pardo Escobar was released

"on conditional parole issued under 8 U.S.C. § 1226(a)." ECF No. 10 at 2. It also "acknowledges that this Court's prior decisions will control the result here if the Court adheres to its prior decisions, as the facts are not materially distinguishable for purposes of the Court's decision, and on that basis the government does not oppose the petition and defers to the Court on the appropriate relief." ECF No. 10 at 2-3.

The proper remedy in this situation is for "Respondents [to be] ordered to immediately release Petitioner from custody under any preexisting conditions of h[is] conditional parole." *Brizo v. Director, Imperial Regional Adult Detention Facility*, No. 26-cv-2664-BTM-DDL, 2026 WL 1218399, *1 (S.D. Cal. May 4, 2026).

Mr. Pardo Escobar thus requests this Court grant his requested relief:

1. Order Respondents to immediately release Petitioner from custody under the same conditions of his conditional parole;
2. Order Respondents to return all property obtained from Petitioner during his recent arrest; and
3. Order Respondents to not cause Petitioner to be re-detained during the pendency of his immigration proceedings without prior leave of this Court.

Respectfully submitted,

Dated: June 17, 2026

s/ Jessie Agatstein

Jessie Agatstein
Federal Defenders of San Diego, Inc.
Email: Jessie_Agatstein@fd.org

With assistance from supervised law student intern Olivia Wallgren under General Order 644-E