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UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

BERSAIN VARGAS-MENDEZ, Petitioner, v. MARKWAYNE MULLIN, Secretary of the United States Department of Homeland Security, et al., Respondents.	Case No. 26-CV-03685-LL-MSB **TRAVERSE TO RESPONDENT'S RETURN TO PETITION** **(Pursuant to Court Order, Dkt. 2)**

Petitioner BERSAIN VARGAS-MENDEZ, through counsel, hereby provides a Traverse to Respondent's Return to Petition For Writ of Habeas Corpus, pursuant to the Court's Standard Procedures issued by the Honorable Linda Lopez. *See* Dkt. No. 2.

Petitioner does not oppose Respondent's characterization that Petitioner qualifies for a bond hearing. However, as stated by Respondent, the Government's heavy caseloads result in an unfair delay at Petitioner's expense. Further, Petitioner has been held in custody for over 35 days without any means of being released. Therefore, the Petition should be granted, and the Court should order Petitioner's immediate release.

Dated: July 7, 2026

/s/ Todd J. Hilts
Todd J. Hilts, Esq.
Attorney for Petitioner,
BERSAIN VARGAS-MENDEZ

CERTIFICATE OF SERVICE

I, HEREBY CERTIFY that on 7th of July, I filed via the Court's CM/ECF system and thereby served the following: REPLY TO RESPONDENTS' RESPONSE TO PETITION to Respondent's counsel:

U.S. Attorney's Office Southern District of California
880 Front Street, Room 6293
San Diego, California 92101

Signature: /s/ Todd J. Hilts
TODD J. HILTS, ESQ.
(Attorney of Record)