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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO

B.D.,
Petitioner,

v.

Todd Blanche, Acting Attorney General of the United States, Department of Justice; *et al.*;

Respondents.

Case No. 26-cv-03873-LEK-DDL

Agency No. [redacted]

PETITIONER'S TRAVERSE

On July 13, 2026, Respondents timely filed a response to the Petitioner's request for relief pursuant to *habeas corpus*. Petitioner timely files this Traverse.

In consideration of the prior rulings of courts in this District, Respondents concede 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 of convincing evidence, that Petitioner poses a danger to the community or a risk of flight." ECF No. 6. In consideration thereof, and in consideration of no other challenge to the petition made by Respondents, Petitioner respectfully requests, as stated in his prayer for relief, an order from this Court requiring an expedient bond

hearing be scheduled within seven (7) days wherein the government must prove by clear and convincing evidence that Petitioner is a flight risk or danger to the community.

Respectfully submitted,

Dated: July 15, 2026

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