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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO

Baltazar Raymundo JUAN[1] Petitioner, v. Todd Blanche, Acting Attorney General of the United States, Department of Justice; *et al.*, Respondents.	Case No. 3:26-cv-3984-JO-SBC **PETITIONER'S TRAVERSE**

Petitioner's prayer is for this Court to require Respondents provide a bond hearing before a fair, neutral, open-minded arbiter, wherein the immigration court must find jurisdiction under 8 U.S.C. § 1226(a). ECF No. 1, ¶ d. Respondents' have effectively conceded to this requested relief given the Respondents acknowledge that this Court's prior decisions will control the result here if the Court adheres to its prior

[1] When filing the petition, Petitioner attempted to convey the correct order of his name by capitalizing his last name, JUAN. However, the Petition has been docketed under his first name. It appears Respondents have thus listed his first name as Juan on their Response. ECF No. 4. To ensure the correct identity of Petitioner and that the final order of this Court is attributed to the Petitioner in his removal proceedings, Petitioner wants to ensure his name is correct for the record. His name:

First Name: Baltazar
Middle Name: Raymundo
Last Name: Juan

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. 4. Petitioner does request that should Respondents fail to follow the order of this Court directing a bond hearing, which naturally should be before a fair, neutral, open-minded arbiter, that Petitioner be immediately released.

Thus, Petitioner respectfully requests a finding in his favor and an order requiring Respondents provide a bond hearing be imminently issued so that his detention not be prolonged.

Respectfully submitted,

Dated: July 20, 2026

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