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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO

Octavio BELLO PEREZ, Petitioner, v. Todd Blanche, Acting Attorney General of the United States, Department of Justice; *et al.*, Respondents.	Case No. 26-cv-04021-RFL-JLB Agency No. [redacted] **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 "prior orders from this District directing bond hearings pursuant to 8 U.S.C. § 1226(a) in similar cases." ECF No. 5. 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