


1 Papa Samba Sy
2 A# 
3 Northwest Detention Center
4 1623 East J Street
5 Tacoma, WA 98421-1615

6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 PAPA SAMBA SY,

10 Petitioner,

11 v.

12 PAMELA BONDI, Attorney General of
13 the United States; KRISTI NOEM,
14 Secretary, United States Department of
15 Homeland Security; DREW BOSTOCK,
16 Seattle Field Office Director, United States
17 Citizenship and Immigration Services;
WARDEN of Immigration Detention
Facility; and the United States Immigration
and Customs Enforcement,

Respondents.

NO. C

REQUEST FOR APPOINTMENT OF
COUNSEL

18 Petitioner Papa Samba Sy hereby requests that the Court appoint the office of the
19 Federal Public Defender for the Western District of Washington, or such other counsel
20 as the Court may deem appropriate, to represent him in this matter. Petitioner does not
21 have the financial resources to retain counsel as he is presently in custody. For these
22 reasons, and because the present petition presents novel and complex issues of law,
23 appointment of counsel would serve the interests of justice. Many other ICE detainees
24 are or will be raising similar habeas challenges against respondents, and this Court will
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benefit from the contributions of experienced, federal counsel in examining these claims. In addition, if an evidentiary hearing is necessary in this case, Petitioner will need the assistance of counsel for such a hearing.

DATED this 21 day of January, 2025.

Respectfully submitted,



[SIGN NAME]

Papa Samba Sy

A#

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