

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION

ANDRANIK GRIGORYAN,  
*Petitioner,*

v.

JAMAL L. JAMISON, in his official capacity as Warden of Federal Detention Center, Philadelphia; BRIAN MCSHANE, in his official capacity as Acting Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations Philadelphia Field Office; KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security; and PAM BONDI, in her official capacity as Attorney General of the United States.

*Respondents.*

PETITION FOR A WRIT  
OF HABEAS CORPUS

Case No.

PETITIONER'S MOTION FOR ORDER TO SHOW CAUSE AND PRELIMINARY  
INJUNCTION AND TEMPORARY RESTRAINING ORDER

In light of Petitioner's prolonged immigration detention which threatens his liberty and physical health and safety, Petitioner respectfully moves this Court for a temporary restraining order or preliminary injunction requiring Respondents to release Petitioner and enjoining them continuing to detain Petitioner during the pendency of this petition, or alternatively to order Petitioner's release from Respondent's custody pursuant to this Court's inherent authority.

Counsel for Petitioner emailed a copy of this motion immediately upon filing to Gregory B. David, Chief of Civil Division with the U.S. Attorney for the Eastern District of Pennsylvania's Philadelphia Office, at [Gregory.David@usdoj.gov](mailto:Gregory.David@usdoj.gov), as well as [USAPAE.USAttorney@usdoj.gov](mailto:USAPAE.USAttorney@usdoj.gov).

Dated: March 14, 2025

Respectfully submitted,

/s/ Ellyn Elizabeth Jameson

Ellyn Jameson

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*Pending pro hac vice admission*

*Pro bono counsel for Mr. Grigoryan*

**CERTIFICATE OF SERVICE**

I, undersigned counsel, hereby certify that on this date, I filed this Petitioner's Memorandum of Law in Support of Motion for Temporary Restraining Order or Preliminary Injunction, Immediate Release Pursuant to *Lucas v. Hadden*, and/or Order to Show Cause using the CM/ECF system. I or my co-counsel will furthermore send a courtesy copy via email to the office of the United States Attorney for the Eastern District of Pennsylvania and send true copies by USPS to the following individuals:

Jamal L. Jamison, Warden  
Federal Detention Center, Philadelphia  
700 Arch St.  
Philadelphia, PA 19106

Brian McShane, Field Office Director  
U.S. Immigration and Customs Enforcement, Philadelphia Field Office  
114 North 8th St.  
Philadelphia, PA 19107

Kristi Noem, Secretary  
U.S. Department of Homeland Security  
Office of the General Counsel  
2707 Martin Luther King Jr. Ave., SE  
Washington, DC 20528

Pam Bondi, Attorney General  
U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530

David Metcalf, U.S. Attorney  
U.S. Department of Justice  
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Philadelphia, PA 19106

Dated: March 14, 2025

Respectfully submitted,

/s/ Ellyn Elizabeth Jameson  
Ellyn Jameson

*Pro bono counsel for Mr. Grigoryan*