

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION
EVGENIIA IVANOVA (A [REDACTED])
Petitioner,

RECEIVED
U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
APR 28 2025

BY: DANIEL J. MCCOY, CLERK *[Signature]*

v.

KRISTI NOEM, ET AL,
Respondents.
Civil Action No.: 6:25-CV-00378
Judge David C. Joseph
Magistrate Judge Carol B. Whitehurst

**MOTION FOR EXTENSION OF TIME AND AMENDED PETITION
FOR WRIT OF HABEAS CORPUS**

(Pursuant to the Court's Memorandum Order dated April 7, 2025)

To the Honorable Court:

I, Evgeniia Ivanova, respectfully submit the following in response to the Court's Order.

1. Bond Hearing Request

I did not request or receive a bond hearing following the Government's appeal of my asylum grant on November 6, 2024.

This is because I entered the United States via a scheduled appointment through CBP One, which is processed as a "parolee" entry. According to current DHS and ICE procedures, individuals who enter under CBP One are not eligible for bond hearings through the immigration court system. Therefore, I was not provided the option to request a bond.

2. Request for Release

I respectfully request release from continued detention at South Louisiana ICE Processing Center in Basile, Louisiana. I believe my detention is unlawful, as I have already been granted asylum and do not pose a danger to the community or a flight risk. My continued detention pending appeal is unjust and places unnecessary hardship on me.

3. Documents Provided

At this time, I do not have additional documents related to a bond hearing because such a hearing was not available to me due to the nature of my entry.

Respectfully submitted,

Date: April 17, 2025

Signature: *Evgeniia Ivanova*

EVGENIIA IVANOVA

A [REDACTED]