

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
JOHNSTOWN DIVISION**

BEYENE TEWODROS DANIEL,)
Petitioner,)

Civil Action No. 3:25-00098-CBB

Vs.)

LEONARD ODDO, et al.)
Respondents,)

FILED

JUN 09 2025

CLERK, U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Dear Clerk

I am the petitioner in the above referenced case and now I respectfully ask that this court issue a stay of removal pending the adjudication of this habeas corpus as I'm a beneficiary of an immediate visa available through a petition known as I-130 immediate visa for a family member of a United States Citizen which has been approved .

Petitioner have ineffective counsel issues that led to denial of his asylum application furthermore, deemed his appeal to be untimely that are in the immigration court record .Counsels consent of failure to notify hearing events which warrants further review .

I have attached a notice from ICE to remove me to a country in which I have no claim of national nor I have any family ties I have alodial ownership and beneficiary interest of lands here in the United States and immediate family to include a fiancée ,a 23 and 21 years of age daughters and an infant son who is about to celebrate his first birthday, all are a United States Citizen by birth For these and other matters that are Pending in the Immigration court and with USCIS I ask this court to issue a stay and notify the opposing party thank you in advance for your assistance in this matter.

(see exhibit A)

RESPECTFULLY SUBMITTED

Beyene Tewodros Daniel