

Petitioner is an asylum seeker whose immigration petitions for review are currently pending.

5. *Second*, Petitioner's transfer will highly likely render any orders of this Jurisdiction less meaningful.
6. In practice, after a detained noncitizen's transfer to another state, Respondents almost always (if not always) file their motions to change administrative venue to the appropriate Immigration Court that controls the dockets of the noncitizen's removal proceedings.
7. A transfer at this stage would irreparably prejudice Petitioner by: (1) Disrupting communication with legal counsel; (2) Interfering with access to documentation and witnesses necessary to support the pending claims; and (3) Potentially mooted relief being sought in this Court or before a USCIS/EOIR decision.
8. Petitioner respectfully requests that this Court exercise its equitable powers to preserve the status quo and prevent irreparable harm pending adjudication of the pending matter(s).
9. Based upon the foregoing reasons, Petitioner respectfully requests that the Court enjoin Petitioner's transfer to another facility while considering his habeas corpus petition.

Respectfully submitted this 16th day of April, 2025.

Respectfully submitted
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