

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

FILED
HARRISBURG, PA

APR 28 2025

PER IL
DEPUTY CLERK

**WENDING MAI, by Next Friend Huan Wang,
Plaintiff,**

v.

**UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE),
CLINTON COUNTY CORRECTIONAL FACILITY,
and JOHN DOES 1-10,
Defendants.**

Case No.: (To be assigned)

**EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS
AND MOTION FOR IMMEDIATE RELEASE
AND COMPLAINT FOR UNLAWFUL DETENTION
WITH SUPPORTING EXHIBITS**

Filed by:

Huan Wang (as Next Friend for Wending Mai)

720 Tanager Dr

State College, PA 16803

Phone: (814) 852-9090

Email: huanwangmai@gmail.com

Date: April 27, 2025

Huan Wang 4/27/2025

Huan Wang 4/27/2025

April 27, 2025

Clerk of the Court

United States District Court

Middle District of Pennsylvania

228 Walnut Street

Harrisburg, PA 17101

Re: Emergency Petition for Writ of Habeas Corpus, Emergency Motion for Immediate Release, and Complaint for Unlawful Detention

Petitioner: Wending Mai

Dear Clerk,

Please find enclosed for filing the following documents on behalf of Petitioner Wending Mai, who is currently detained:

1. Emergency Petition for Writ of Habeas Corpus and Emergency Motion for Immediate Release
2. Complaint for Unlawful Detention
3. Exhibits A - [Z] (attached as supporting documents)

Due to the urgent nature of the petition, Petitioner respectfully requests that this matter be forwarded to the duty judge immediately for emergency consideration.

Respectfully submitted,

/s/ Huan Wang (as Next Friend for Wending Mai)

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Huan Wang

Huan Wang 4/27/2025

720 Tanager Dr

III. FACTUAL BACKGROUND

- On April 22, 2025, Petitioner was detained by ICE agents while en route to a medical appointment.
- Petitioner was not informed of his right to remain silent or to seek counsel.
- Petitioner was handcuffed and forcibly taken back to his home to retrieve his passport without a valid warrant or voluntary consent.
- At home, the agents entered without proper consent from Huan Wang, who was present but unable to understand English and under distress.
- In detention, Petitioner was coerced into signing documents without being allowed to review or understand them.
- Petitioner holds a valid Employment Authorization Document (EAD) and has recently been selected in the H1B visa lottery.
- Petitioner has strong community ties, including stable employment, a clean background, tax payment history, three minor children (two U.S. citizens), and support from religious organizations.

IV. LEGAL ARGUMENTS

- Petitioner's detention is unconstitutional under the Fourth, Fifth, and Sixth Amendments.
- Petitioner's procedural due process rights have been violated.
- There exists no lawful basis for Petitioner's continued detention.
- Immediate release is warranted to prevent irreparable harm to Petitioner and his family.

V. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Issue a Writ of Habeas Corpus ordering Petitioner's immediate release;

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WENDING MAI,

Petitioner,

v.

UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE),

Respondent.

Case No.: (To be assigned)

EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS

AND

EMERGENCY MOTION FOR IMMEDIATE RELEASE

Petitioner Wending Mai, by and through his Next Friend, Huan Wang, respectfully petitions this Honorable Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and moves for his immediate release based on the following grounds:

I. INTRODUCTION

Petitioner Wending Mai is currently unlawfully detained by ICE. His detention violates his constitutional rights, including his rights under the Fourth, Fifth, and Sixth Amendments of the United States Constitution. Petitioner respectfully seeks immediate relief due to the urgent and unlawful circumstances surrounding his detention.

II. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 2241 and 28 U.S.C. § 1331. Venue is proper as Petitioner is detained within the jurisdiction of this Court.

III. FACTUAL BACKGROUND

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- Immediate release is warranted to prevent irreparable harm to Petitioner and his family.

V. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Issue a Writ of Habeas Corpus ordering Petitioner's immediate release;

2. Grant the Emergency Motion for Immediate Release pending further proceedings;
3. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Huan Wang (as Next Friend for Wending Mai)

Huan Wang *Huan Wang 4/27/2025*

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State College, PA 16803

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Dated: April 27, 2025

