

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

**AMIR HOSSEIN MAHDEJIAN**

*Petitioner,*

v.

**BRET BRADFORD**, *in his official capacity as Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations, Houston Field Office;*

**ALEXANDER SANCHEZ**, *in his official capacity as Facility Administrator of the IAH Secure Adult Detention Facility; and*

**KRISTI NOEM**, *in her official capacity as Secretary, U.S. Department of Homeland Security;*

*Respondents.*

**EMERGENCY APPLICATION  
FOR A TEMPORARY  
RESTRAINING ORDER**

Case No. **1:25-cv-341**

**EMERGENCY APPLICATION FOR A TEMPORARY RESTRAINING  
ORDER**

**I. Introduction**

On information and belief, Petitioner Amir Hossein Mahdejian – an Iranian national with a 2011 order withholding his removal to Iran – is in danger of being arbitrarily removed from the United States to an unknown country and with no opportunity to establish that his life or freedom would be threatened in said unknown country. His removal would deprive this Court of jurisdiction. Petitioner requests a

30-day notice of any intent to remove Petitioner, identifying the country to which he will be removed, and the opportunity to contest the removal to such third country.

## **II. Request for Relief**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure and the All Writs Act, Petitioner hereby applies for a temporary restraining order against Respondents Bret Bradford, Director of the Houston Field Office of U.S. Immigration and Customs Enforcement, Alexander Sanchez, Facility Administrator at the IAH Secure Adult Detention Facility, the place of Petitioner's detention, and Kristi Noem, Secretary of the U.S. Department of Homeland Security. Petitioner was granted withholding of removal by a U.S. immigration judge. He is presently detained in civil immigration detention at the IAH Secure Adult Detention Facility, Livingston, Texas.

As set forth in the accompanying Memorandum of Law, Respondents' attempts to deport Petitioner to any country in the world that will accept him without providing him with an opportunity to contest such removal violates rights secured to him by the Due Process Clause, the Immigration and Nationality Act, and the regulations implementing the United Nations Convention Against Torture. Petitioner has no guarantees that the unknown country to which he will be removed is a country where he can find safety, nor does he have any reason to believe that country will honor the Immigration Judge's order preventing his removal to Iran,

where he is more likely than not to be persecuted, tortured, or killed. In the absence of a temporary restraining order, Petitioner will suffer irreparable injury, and the balance of hardships and the public interest strongly favor relief. Critically, if Petitioner is removed to the custody of another country, the Court may lose jurisdiction permanently.

In support of this Motion, Petitioner relies on the accompanying memorandum in support of a Temporary Restraining Order. A proposed order is attached for the Court's convenience. Petitioner respectfully requests that this Court grant this emergency application and issue a temporary restraining order as soon as possible.

Date: June 27, 2025

Respectfully submitted,

/s/ Ashley L. Kaper

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\*Moving for *pro hac vice* admission

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, along with all attachments thereto, to this Court's CM/ECF case management system, which will send a Notice of Electronic Filing (NEF) to all case participants.

/s/ Ashley L. Kaper

Ashley L. Kaper

Local Counsel for Petitioner