I usupov Iusa Fzhan Name / Nombre: 1 FILEC 2 A Number / Número A: 3 ao Iden State Address / Dirección: 4 CLERK U.S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA 5 6 PRO SE 7 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF CALIFORNIA 10 TUSU DOV ISUFZBAD 11 1:25-cv-00838 12 [Full Name / Nombre Completo] 13 Petitioner, 14 15 Case No. 16 Warden of the Cidden Stame times 17

Motion for Appointment of Counsel Pursuant to 18 U.S.C. § 3006A

Detention Facility, Current or Acting Field Office Director, San Francisco Field Office, United States Immigration and Customs Enforcement; Current or Acting Director, Visional States Immigration and Customs United States Immigration and Customs Enforcement; Current or Acting Secretary, United States Department of Homeland Security; and Current or Acting United States Attorney General,

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Respondents.

Petitioner [your name / su nombre] \_ ING pov ISUFzha. filed a petition for writ of habeas corpus under 28 U.S.C. § 2241 challenging Petitioner's indefinite detention by Respondents. Petitioner was detained by Immigration and Customs

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1	Enforcement (ICE) on or about [date / el mes y año en que comenzó su detención por ICE]
3	04/02/2024 Petitioner has remained in ICE crestody since that date.
3	Petitioner's removal proceedings remain pending.
4	The concurrently filed petition for writ of habeas corpus sets forth Petitioner's eligibility
5	for a writ of habeas corpus ordering Petitioner's release.
6	Petitioner moves the Court to appoint counsel to represent Petitioner in this case. The
7	Court may appoint counsel in a habeas action when the "interests of justices so require." 18
8	U.S.C. § 3006A(a)(2)(B). Here, Petitioner has a strong chance of success on the merits as
9	explained in the concurrently filed petition for writ of habeas corpus. However, given the
10	complexity of the law on immigration detention and Petitioner's status as a detained immigrant,
11	Petitioner would have great difficulty presenting the case without the assistance of counsel. For
12	these reasons, Petitioner respectfully requests that the Court appoint counsel.
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