

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

FILED OCT 16 25 AM 8:29
MDGA-COL

O.K.,

Petitioner,

v.

DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Respondents.

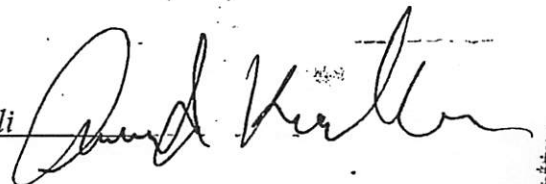
Case No. 4:25-cv-257-CDL-CHW
28 U.S.C. § 2241

PETITIONER'S MOTION FOR A TEMPORARY RESTRAINING ORDER

Petitioner respectfully asks the Court for a temporary restraining order (TRO). Petitioner's been in direct contact with his deportation officer since arriving to the Stewart Detention Center on July 07, 2025, and through those communications Petitioner's deportation officer (DO Scott) mentioned that ICE will try to send the petitioner to a 3rd country upon Iran's refusal to issue a travel document for the Petitioner. Petitioner's departure to a third country jeopardizes his safety and livelihood as he does not speak their language and his future is unknown on his arrival to another country. Furthermore, Petitioner has never had a passport from any country which will cause the Petitioner to be stranded in a country where he most likely does not speak their language nor he could leave it or find a way to go back to Iran. Respondent's failure to obtain a travel document from Petitioner's country (Iran) in 2021 and now shows the Court that the Petitioner's not likely to be deported in the foreseeable future, therefore Petitioner asks the Court to grant his motion for a temporary restraining order.

Respectfully to the Court's discretion in its decision.

Omid kamali



Affidavit.

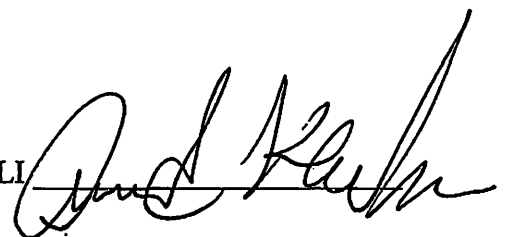
I have filed two separate motions before receiving Respondent's comprehensive response to my petition's writ of habeas Corpus on September 22, 2025. Before I was finished with my briefing to Respondent's comprehensive response, my two separate petitions (1) Motion to request a show-cause and (2) Motion for A Temporary restraining order, were returned back to me as they needed to be signed. I am also writing this affidavit in hopes that I could explain to the Court that how an immediate and irreparable injury will result if I were to be sent to another country other than my own country of origin.

Before having all of this information I even texted my DO Scott and told him that I would be fine with being sent to another country as long as it is one of my neighboring countries. But I believe that the respondent have broken laws and their own regulation to re-detain me and at this point I have no doubt that they would just send me anywhere without thinking for a second what my living conditions might look like. Furthermore, I believe that my immediate irreparable injury is my constitutional rights that have been broken and will be broken, which will eventually cause me to live in a country where I would not be able to go anywhere and be stuck for the rest of my life. Of course I have no idea as what will happen if I were to be deported to a country where I know nothing about, but what I am certain of is the fact that I will be suffering far from my family and stranded in a country that I have nothing to do with.

For those reasons I request respectfully that Court grant my motion for Temporary restraining order and grant my motion to request a show-cause.

Submitted on 30th day of September, 2025.

OMID KAMALI

A handwritten signature in black ink, appearing to read 'Omid Kamali', written over a horizontal line.