

Haytham Makhoun
A# [REDACTED]

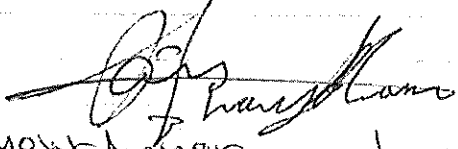
The honorable Judge
Kathleen Carolone,

I take full responsibility for all my past actions,
I cannot change the past but I can change the future, I
have served my time for my past charges, but this ICE
detention since Feb 4, 2025 is an additional sentence
that NO Judge has ruled.

When I spoke to my deportation office Garcia C,
at the EL Paso detention Center, he told me that I will be
in detention under ICE custody until they get me a travel
document from which ever country is willing to accept me.

When I spoke to the Israeli Counsel, he assured me
that I have NO pending travel document because I'm not
Israeli citizen, I am a Palestinian Refugee that is a victim
of a religious war which makes me stateless.

I beg your mercy in this matter, The ICE detention
is inhuman and I don't think it's fair to be languishing here
indefinitely.

 October 4, 2025
Thank you for your honor
God bless your heart and life.

Haytham Madhoun

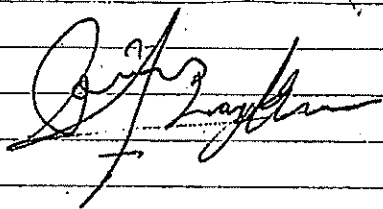
A# 

The honorable Judge
Kathleen Caralone

I pray that your honor grant my motion for
Appointment of Counsel even though I have not
Send it with the habeas,

I really just found out there is a motion for
this matter.

Thank you much



09/30/2025

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

Form 24. Motion for Appointment of Counsel

Instructions for this form: <http://www.ca9.uscourts.gov/forms/form24instructions.pdf>

9th Cir. Case Number(s) NO. 3:25-CV-00312-KC

Case Name

Lower Court or Agency Case Number

1. My name is Haytham Fawzi Salah Madhoun

2. I am asking the court to appoint an attorney to help me with this case.

3. My fee status is as follows (select one):

☒ The district court or this court granted my motion to proceed in forma pauperis.

☐ I filed a motion to proceed in forma pauperis but the court has not yet ruled on the motion.

☐ This motion is accompanied by a motion to proceed in forma pauperis.

☐ I paid the filing fees for this case. However, I cannot afford an attorney for the following reasons:

4. Is this a civil appeal or petition for review? ☐ Yes ☒ No

If yes, attach an additional page(s) describing the issues on appeal.

My current mailing address

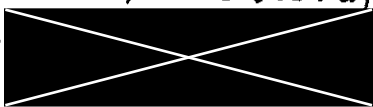
8915 Montana Ave

City EL Paso State TX Zip Code 79925

Prisoner Inmate or A Number (if applicable)

Signature [Signature] Date 09/30/2025

Feedback or questions about this form? Email us at forms@ca9.uscourts.gov

Haytham Makhoul
A # 

Travel Document Confirmation,

The honorable Judge,
Kathleen Cardone

I Haytham Makhoul attest and confirm that all the information in this letter is true and accurate,

Every time I ask ICE about an update for my case, they keep giving me same answer that my travel document from Israel is pending,

We have phones here and numbers for other countries embassies, So I called the Israeli embassy number after I push 6 for Pro Bono and then I dial 838-ISRAEL,

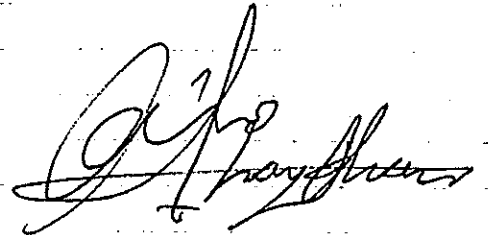
I called the operator and I explained my story being in detention for over 8 months waiting on my travel document which is pending, She puts me on hold she find the right person to help me, after few minutes she get back on the phone line and said I'm going to connect you to the Consulate, I explain to him my story again, he said give him a minute to check with the travel documents department,

After he check if they got any thing in my name
he said "you Not Israeli Citizen" you have
"No travel document" that is pending whatsoever
simply because Im Not Israeli citizen.

He confirmed that I have nothing pending period.
Your honor please help me with this matter, they
keep using a false claim to keep me in custody the
longest period of time after some ICE officers
told me that Im never going to be released under
this new administration, and I might have to stay in
detention and wait for the next one to take
over in January 20, 2021.

They are so serious, but what I have done ???
please help me your honor
for God sake

god bless your life
and heart,
thank you much



Haytham Maelhoon
A# 

09/26/2025

FILED 10/09/25
 NAME *Hanthan Madhoun*
 A [REDACTED] UNIT [REDACTED]
 ICE PROCESSING CENTER
 8915 MONTANA
 EL PASO, TX 79925

EL PASO TX 798

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To the honorable Judge Kathleen [REDACTED]
 United States District Court for the
 Western District Court of Texas
 Albert Armendariz SR,
 United States Courthouse
 525 Magoffin Avenue
 Room 105

EL PASO TX 79901

79901-257830