

Petition for Writ of Habeas Corpus

DANIEL J. McCOY, CLERK

BY: KW

I, Tatiana Vysokikh, residing at [REDACTED] Brooklyn, NY 11229-5009, telephone [REDACTED]
[REDACTED] email vysokih.tatayana68@gmail.com, am the mother of detainee Dmitrii Vysokikh (A#
[REDACTED]), born on [REDACTED] 1998, currently held at Adams County Detention Center, 20 Hobo Fork
Road, Natchez, MS 39120 under the supervision of Officer Vommaro Giuliano (G10987). My son has
been in ICE custody since August 10, 2024. His immigration court hearing was held on January 24,
2025.

Pursuant to 28 U.S.C. § 2241, I respectfully petition this Court to issue a Writ of Habeas Corpus
ordering the release of my son Dmitrii Vysokikh from immigration detention, as his continued detention
violates the principles established in Zadvydas v. Davis, 533 U.S. 678 (2001) and Clark v. Martinez,
543 U.S. 371 (2005).

Under these rulings, immigration detention beyond a reasonable period (presumptively six months) is
unlawful when there is no significant likelihood of removal in the reasonably foreseeable future. My son
has been detained for more than 12 months without any attempt by ICE to deport him.

I request that the Court order the immediate release of Dmitrii Vysokikh under appropriate supervision,
or compel ICE to promptly carry out his removal if possible. Attached to this petition are Exhibits 1–4,
including a letter of support, correspondence with ICE, and evidence of his current detention.

Date: 08/15/25
Signature: Tatiana Vysokikh
Name: Tatiana Vysokikh