Name: MORADI GHARIBVAND IMAN

A Number:

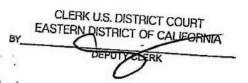
Address: Golden State Annex

611 Frontage Rd, CA 93250

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AUG 18 2025



UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

MORADI GHARIBVAND IMAN



Petitioner,

Warden of the Golden State Annex Detention Facility, Current or Acting Field Office Director, San Francisco Field Office, United States Immigration and Customs Enforcement; Current or Acting Director, United States Immigration and Customs Enforcement: Current or Acting Secretary, United Homeland Department of Security; and Current or Acting United States Attorney General.

Respondents.

1:25-10-101037-EPG(4C)

Case No.

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

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

INSTRUCTIONS FOR FILING AN APPLICATION TO PROCEED IN FORMA PAUPERIS BY A PRISONER UNDER 28 U.S.C. § 1915

You must submit to the court a completed <u>Prisoner's Application to Proceed In Forma Pauperis</u> if you are unable to pay the entire filing fee and/or if you are asking to be appointed a free attorney. Your application must include copies of the prisoner trust account statement showing transaction for the last six months and a certificate of funds in prisoner's account, signed by an authorized officer of the institution. Please write your answers in English.

Hebeas Actions

The fee for filing a petition for a writ of habeas corpus is \$5 (\$5 filing fee plus \$0 administrative fee). If you are granted leave to proceed <u>in forma pauperis</u>, you will not be required to pay any portion of this fee. If you are not granted leave to proceed <u>in forma pauperis</u>, you must pay the fee in one payment and not in installments.

Petitioner Moradi Gharibvand Iman has 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 Enforcement (ICE) on or about (Date 01/09/2025) Golden State Annex Petitioner has remained in ICE custody since that date. Petitioner's removal proceedings remain pending.

The concurrently filed petition for writ of habeas corpus sets forth Petitioner's eligibility for a writ of habeas corpus ordering Petitioner's release.

Petitioner moves the Court to appoint counsel to represent Petitioner in this case. The Court may appoint counsel in a habeas action when the "interests of justices so require." 18 U.S.C. § 3006A(a)(2) (B). Here, Petitioner has a strong chance of success on the merits as explained in the concurrently filed petition for writ of habeas corpus. However, given the complexity of the law on immigration detention and Petitioner's status as a detained immigrant, Petitioner would have great difficulty presenting the case without the assistance of counsel. For these reasons, Petitioner respectfully request that the Court appoint counsel.

Date: August 14, 2025

Moradi Gharibvand Iman

Signature .