

Name: MORADI GHARIBVAND IMAN

A Number: [REDACTED]

Address: Golden State Annex  
611 Frontage Rd, CA 93250

**PRO SE**

**FILED**

**AUG 18 2025**

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY [Signature]  
DEPUTY CLERK

**UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF CALIFORNIA**

MORADI GHARIBVAND IMAN

A#: [REDACTED]

Petitioner,

v.

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  
States Department of Homeland  
Security; and Current or Acting United  
States Attorney General.

Respondents.

1:25-cv-01037-EPG (41)

Case No. [REDACTED]

**Motion for Appointment of counsel  
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**

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You must submit to the court a completed Prisoner's Application to Proceed In Forma Pauperis 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 in forma pauperis, you will not be required to pay any portion of this fee. If you are not granted leave to proceed in forma pauperis, 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  
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Moradi Gharibvand Iman  
\_\_\_\_\_

Signature

