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*Prospective Attorney for Petitioner*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Sofyan Mohamed Abelmageed Badr,

Petitioner,

vs.

David R. Rivas, Warden, San Luis Regional  
Detention and Support Center;

Gregory J. Archambeault, San Diego Field  
Office Director, U.S. Immigration and  
Customs Enforcement;

Kristi Noem, United States Secretary of  
Homeland Security; and

Pamela Bondi, Attorney General of the  
United States,

Respondents.

No.

**Motion for Appointment of Counsel  
Under 18 U.S.C. § 3006A(a)(2)(B)**

Simultaneously with this motion, petitioner Sofyan Mohamed Abelmageed Badr is filing a petition for a writ of habeas corpus under 28 U.S.C. § 2241. In his petition, Mr. Badr asserts that his arrest and detention contravene the Immigration and Nationality Act, the Fifth Amendment to the United States Constitution, and the Administrative Procedure Act. Mr. Badr respectfully asks the Court to appoint Assistant Federal Public Defender Daniel L. Kaplan to assist him in litigating his petition. Mr. Kaplan has spoken with Badr, who confirmed that he

would like Mr. Kaplan to represent him in connection with his habeas corpus petition. Mr. Kaplan, undersigned here, hereby confirms that he has reviewed documents and legal authorities pertaining to Mr. Badr's habeas corpus petition, and stands ready to represent Mr. Badr in connection with the petition.

Under 18 U.S.C. § 3006A(a)(2)(B), this Court may appoint counsel for any person seeking relief under 28 U.S.C. § 2241. The Ninth Circuit has said that a court should appoint counsel under this provision if the petitioner is likely to succeed on his petition and to have difficulty “articulat[ing] his claims *pro se* in light of the complexity of the legal issues involved.” *Weygandt v. Look*, 718 F.2d 952, 954 (9th Cir. 1983) (per curiam). Mr. Badr's habeas corpus petition filed herewith demonstrates the likelihood of success in his quest for habeas corpus relief. As an indigent Sudanese individual with no legal education and a very limited command of English, Mr. Badr is unable to effectively vindicate his claims without the assistance of an attorney. Mr. Badr thus respectfully asks the Court to appoint Assistant Federal Public Defender Daniel L. Kaplan to assist him in this matter.

Respectfully submitted:

September 8, 2025.

JON M. SANDS  
Federal Public Defender

*s/Daniel L. Kaplan*  
DANIEL L. KAPLAN  
Assistant Federal Public Defender  
*Prospective Attorney for Petitioner*