

1 Name: DJAHANDIDEH FARSHID

2 A Number: AO [REDACTED]

3 Address: PO Box 6300  
4 Florence, AZ  
5 85132

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7 PRO SE

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF ARIZONA

11 Name: DJAHANDIDEH FARSHID

Case No.

12 Petitioner,

CV25-03337-PHX-SPL--CDB

13 N. MARTINEZ,  
14 ESTEDA  
15 ICE, IRO, DHS

MOTION FOR APPOINTMENT OF  
COUNSEL PURSUANT TO 18  
U.S.C. § 3006A

18 Respondents.

17 THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING  
18 TO FEDERAL AND/OR LOCAL RULES AND PRACTICES  
19 AND IS SUBJECT TO REJECTION BY THE COURT.  
20 REFERENCE LRCP 5.4  
(Rule Number/Section)

21 Petitioner [name]

DJAHANDIDEH FARSHID

22 has filed a petition for writ of  
23 habeas corpus under 28 U.S.C. § 2241 challenging Petitioner's indefinite detention by  
24 Respondents. Petitioner was detained by Immigration and Customs Enforcement (ICE) on or  
25 about [date] 4-2-2025. Petitioner has remained in ICE custody since that  
26 date. An Immigration Judge ordered Petitioner removed and Petitioner's removal order became  
27 final on or about [date] Jan. 16, 2007, but ICE has been unable to remove  
28 Petitioner.

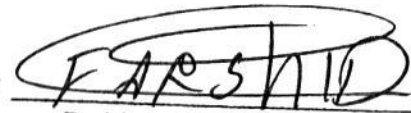
1  
2 In *Zadvydas v. Davis*, the Supreme Court held that the immigration statute 8 U.S.C. §  
3 1231(a)(6) does not allow ICE to detain a noncitizen indefinitely while attempting to carry out  
4 removal. 533 U.S. 678, 689 (2001). After six months of presumptively-reasonable detention, if  
5 the noncitizen provides good reason to believe that removal is not reasonably foreseeable, the  
6 burden shifts to the government to rebut that showing. *Id.* at 701.

7 Petitioner moves the Court to appoint counsel to represent Petitioner in this case. The  
8 Court may appoint counsel in a habeas action when the "interests of justice so require." 18 U.S.C.  
9 § 3006A(a)(2)(B). Here, Petitioner has a strong chance of success on the merits because  
10 Petitioner has been held for longer than six months since being ordered removed and Petitioner's  
11 country still refuses to accept him or her. However, given the complexity of the law on  
12 immigration detention and Petitioner's status as a detained immigrant, Petitioner would have  
13 great difficulty presenting the case without the assistance of counsel. For these reasons, Petitioner  
14 respectfully requests that the Court appoint counsel.

Date:

9-2-25

Signature:



Petitioner