

1 Name: DJAHANDIDEH FARSHID
2 A Number: AO 

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4 Florence, AZ
5 85132

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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF ARIZONA
11 Name: DJAHANDIDEH FARSHID Case No.
12 Petitioner,

13 N. Martinez,
14 ESTEPA,
15 ICE, ERO, DHS

16 Respondents.
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19 THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING
20 TO FEDERAL AND/OR LOCAL RULES AND PRACTICES
21 AND IS SUBJECT TO REJECTION BY THE COURT.
22

23 REFERENCE LocWP 5.4
(Rule Number/Section)

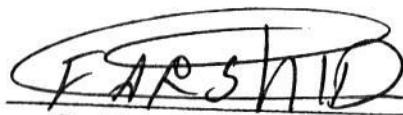
24 Petitioner [name] DJAHANDIDEH FARSHID has filed a petition for writ of
25 habeas corpus under 28 U.S.C. § 2241 challenging Petitioner's indefinite detention by
26 Respondents. Petitioner was detained by Immigration and Customs Enforcement (ICE) on or
27 about [date] 4-2-2025. Petitioner has remained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

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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.

15 Date: 9-2-25

16 Signature:


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Farshid
Petitioner