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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 Peejman Shadalo,
16 Petitioner,

17 v.

18 John Mattos, NSDC Warden; Michael
19 Bernacke, Field Director, West Valley City
20 Office of ICE ERO; Todd Lyons, ICE
Acting Director; Kristi Noem DHS
Secretary; Pam Bondi, U.S. Attorney
General

21 Respondents.
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Case No. 2:25-cv-02076-RFB-BNW

**Motion for Temporary Restraining
Order**

POINTS AND AUTHORITIES

Petitioner Peejman Shadalo faces immediate irreparable harm: (1) revocation of his release on immigration supervision, despite ICE’s failure to follow its own revocation procedures; (2) indefinite immigration detention with no reasonable prospect of removal in the reasonably foreseeable future to the country designated by the immigration judge (“IJ”); and (3) potential removal to a third country never considered by an IJ. Beyond that, Petitioner’s family faces extraordinary hardship during his illegal detention because, upon belief, he is the primary caretaker of his ailing mother, who is a U.S. citizen. This Court should grant temporary relief to preserve the status quo.

Petitioner has lived in the United State since he was 10 years old, when he arrived here with his family as a refugee. In 2013, an IJ ordered Shadalo removed to Iran, but also granted deferral of removal under the Convention Against Torture (CAT). Since then, the government has proved unable to remove him and Shadalo has been out of custody on an Order of Supervision (OSUP) from ICE. Yet on June 25, 2025, the government re-detained him when he appeared as scheduled at an appointment with his probation officer.¹ ICE gave him no opportunity to contest his re-detention, and there are no apparent changed circumstances justifying it. ICE does not appear to have a travel document in hand. Worse yet, because ICE is forbidden from removing Petitioner to Iran due to his CAT protection, ICE’s own policies allow ICE to remove him to a third country never before considered by an IJ, with either 6-to-24-hour notice or no notice at all.

Petitioner is therefore facing both unlawful detention and a threat of removal to a dangerous third country without due process. The requested temporary

¹ Notably, Shadalo had been fully compliant with probation. ECF No. 1-1 at 21.

1 restraining order (“TRO”) would preserve the status quo while Petitioner litigates
2 these claims by (1) reinstating Petitioner's release on supervision, (2) prohibiting
3 the government from revoking his OSUP without first following the required
4 statutory procedures and (2) prohibiting the government from removing him to a
5 third country without an opportunity to file a motion to reopen with an IJ.

6 In granting this motion, this Court would not break new ground. Several
7 courts have granted TROs or preliminary injunctions mandating release for post-
8 final-removal-order immigrants like Petitioner. *See Rodriguez-Gutierrez v. Noem*,
9 No. 25-cv-02726-BAS-SBC (S.D. Cal. Nov. 7, 2025); *Phetsadakone v. Scott*, 2025 WL
10 2579569, at *6 (W.D. Wash. Sept. 5, 2025); *Hoac v. Becerra*, No. 2:25-CV-01740-DC-
11 JDP, 2025 WL 1993771, at *7 (E.D. Cal. July 16, 2025); *Phan v. Beccerra*, No. 2:25-
12 CV-01757-DC-JDP, 2025 WL 1993735, at *7 (E.D. Cal. July 16, 2025); *Nguyen v.*
13 *Scott*, No. 2:25-CV-01398, 2025 WL 2419288, at *29 (W.D. Wash. Aug. 21, 2025).

14 Several more have ordered release for petitioners whose immigration cases
15 are still pending.² *See, e.g., Hinestroza v. Kaiser*, No. 25-CV-07559-JD, 2025 WL
16 2606983, at *2 (N.D. Cal. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK,
17 2025 WL 2607924, at *12 (D. Mass. Sept. 9, 2025); *R.D.T.M. v. Wofford*, No. 1:25-
18 CV-01141-KES-SKO (HC), 2025 WL 2617255, at *6 (E.D. Cal. Sept. 9, 2025). These
19 courts have determined that, for these long-term releasees, liberty is the status quo,
20 and only a return to that status quo can avert irreparable harm.

21 Several courts have likewise granted temporary restraining orders
22 preventing third-country removals without due process. *See, e.g., J.R. v. Bostock*,
23 25-cv-01161-JNW, 2025 WL 1810210 (W.D. Wash. Jun. 30, 2025); *Vaskanyan v.*

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² Because immigration detainees whose cases have not been adjudicated are
entitled only to a bond hearing-not to outright release-some of these TROs require
release unless ICE provides that hearing. But because *Zadvydas* requires outright
release on supervision, a TRO fitted to Petitioner's claims should order that relief.

1 *Janecka*, 25-cv-01475-MRA-AS, 2025 WL 2014208 (C.D. Cal. Jun. 25, 2025); *Ortega*
2 *v. Kaiser*, 25-cv-05259-JST, 2025 WL 1771438 (N.D. Cal. June 26, 2025); *Hoac v.*
3 *Becerra*, No. 2:25-CV-01740-DC-JDP, 2025 WL 1993771, at *7 (E.D. Cal. July 16,
4 2025); *Phan v. Becerra*, No. 2:25-CV-01757-DC-JDP, 2025 WL 1993735, at *7 (E.D.
5 Cal. July 16, 2025).

6 Granting this relief would not even be breaking new ground in this District.
7 Another court in this District recently granted habeas relief on this basis. *See*
8 *Gomez v. Mattos*, No. 2:25-CV-00975-GMN-BNW, 2025 WL 3101994, at *6–7 (D.
9 Nev. Nov. 6, 2025). Petitioner therefore respectfully requests that this Court grant
10 this TRO.

11 STATEMENT OF FACTS

12 Concurrent with this motion, Petitioner files his amended § 2241 petition.
13 Petitioner incorporates by reference the statements of fact set forth in those
14 pleadings.

15 ARGUMENT

16 To obtain a TRO, a plaintiff “must establish that he is likely to succeed on the
17 merits, that he is likely to suffer irreparable harm in the absence of preliminary
18 relief, that the balance of equities tips in his favor, and that an injunction is in the
19 public interest.” *Winter v. Nat. Res. Def Council, Inc.*, 555 U.S. 7, 20 (2008); *accord*
20 *Stuhlbarg Int’l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839-40 & n.7 (9th
21 Cir. 2001) (noting that a TRO and preliminary injunction involve “substantially
22 identical” analysis). A “variant[] of the same standard” is the “sliding scale”: “if a
23 plaintiff can only show that there are ‘serious questions going to the merits’—a
24 lesser showing than likelihood of success on the merits—then a preliminary
25 injunction may still issue if the balance of hardships tips *sharply* in the plaintiff’s
26 favor, and the other two *Winter* factors are satisfied.” *Immigrant Defenders Law*
27 *Center v. Noem*, 145 F.4th 972, 986 (9th Cir. 2025) (internal quotation marks

1 omitted). Under this approach, the four *Winter* elements are “balanced, so that a
2 stronger showing of one element may offset a weaker showing of another.” *All. for*
3 *the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131 (9th Cir. 2011). A TRO may be
4 granted where there are “serious questions going to the merits’ and a hardship
5 balance ... tips sharply toward the plaintiff,” and so long as the other *Winter* factors
6 are met. *Id.* at 1132.

7 Here, this Court should issue a temporary restraining order because
8 “immediate and irreparable injury . . . or damage” is occurring and will continue in
9 the absence of an order. Fed. R. Civ. P. 65(b). Not only have Respondents re-
10 detained Petitioner in violation of his due process, statutory, and regulatory rights.
11 ICE policy also allows them to remove him to a third country in violation of his due
12 process, statutory, and regulatory rights. This Court should order Petitioner’s
13 release and enjoin removal to a third country with no or inadequate notice.

14 **I. Petitioner will likely succeed on the merits, or at a minimum,**
15 **Petitioner raises serious merits questions.**

16 In his amended § 2241 petition, Petitioner raises five claims that he has been
17 unconstitutionally detained and that he cannot be removed to a third country.

18 Petitioner addresses the merits of each claim below:

19 **A. Petitioner is likely to succeed on the merits of his claim that**
20 **his detention violates *Zadvydas* and the Immigration and**
21 **Nationality Act, 8 U.S.C. § 1231(a)(6). (Grounds 1 and 2).**

22 In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court considered a
23 problem affecting people like Petitioner: Federal law requires ICE to detain an
24 immigrant during the “removal period,” which typically spans the first 90 days after
25 the immigrant is ordered removed. 8 U.S.C. § 1231(a)(1)-(2). And after that 90-day
26 removal period expires, ICE may detain the migrant while continuing to try to
27 remove them. *Id.* § 1231(a)(6). If that subsection were understood to allow for
“indefinite, perhaps permanent, detention,” it would pose “a serious constitutional

1 threat.” *Zadvydas*, 533 U.S. at 699. In *Zadvydas*, the Supreme Court avoided the
2 constitutional concern by interpreting § 1231(a)(6) to incorporate implicit limits. *Id.*
3 at 689. As an initial matter, *Zadvydas* held that detention is “presumptively
4 reasonable” for six months after the removal order becomes final. *Id.* at 701.

5 After six months, detention ceases to be presumptively reasonable. Courts
6 use a burden-shifting framework to decide whether detention remains authorized.
7 First, the petitioner must prove that there is “good reason to believe that there is no
8 significant likelihood of removal in the reasonably foreseeable future.” *Id.* If he does
9 so, the burden shifts to “the Government [to] respond with evidence sufficient to
10 rebut that showing.” *Id.* Ultimately, then, the burden of proof rests with the
11 government: The government must prove that there is a “significant likelihood of
12 removal in the reasonably foreseeable future,” or the immigrant must be released.
13 *Id.*

14 Here, Petitioner was ordered removed much more than 6 months ago, as his
15 removal order became final in 2013.³ He has also been detained since June 25,
16 2025.⁴ On information and belief, Shadalo was previously detained for the initial 90-
17 day remove period in 2013, so he has cumulatively been detained for over 6 months.
18 Even without counting the initial 90-day detention from 2013, Shadalo’s present
19 detention has already spanned five months, and there is no significant likelihood of
20 removal, so Shadalo still prevails. Thus, this Court will likely find that Petitioner
21 warrants *Zadvydas* relief.

26 ³ See Amended Petition Ex. 2.

27 ⁴ ECF No. 1-1 at 1, 4.

1 **B. Petitioner is likely to succeed on the merits of his claim that**
2 **ICE violated its own regulations (Ground 3).**

3 In addition to Zadvydas’s protections, 8 C.F.R. §§ 241.4(l), 241.13(i) provide
4 extra process for re-detentions. These regulations permit an official to “return[s]
5 [the person] to custody” because they “violate[d] any of the conditions of release.” 8
6 C.F.R. § 241.13(i)(1); *accord id.* § 241.4(l)(1). Otherwise, they permit revocation of
7 release only if the appropriate official (1) “determines that there is a significant
8 likelihood that the alien may be removed in the reasonably foreseeable future,” and
9 (2) makes that finding “on account of changed circumstances.” *Id.* § 241.13(i)(2).

10 No matter the reason for re-detention, the re-detained person is entitled to
11 “an initial informal interview promptly,” during which they “will be notified of the
12 reasons for revocation.” *Id.* §§ 241.4(l)(1), 241.13(i)(3). The interviewer must
13 “afford[] the [person] an opportunity to respond to the reasons for revocation,”
14 allowing them to “submit any evidence or information” relevant to re-detention and
15 evaluating “any contested facts.” *Id.*

16 ICE is required to follow its own regulations. *United States ex rel. Accardi v.*
17 *Shaughnessy*, 347 U.S. 260, 268 (1954); *see Alcaraz v. INS*, 384 F.3d 1150, 1162 (9th
18 Cir. 2004) (“The legal proposition that agencies may be required to abide by certain
19 internal policies is well-established.”). A court may review a re-detention decision
20 for compliance with the regulations. *See Gomez v. Mattos*, No. 2:25-CV-00975-GMN-
21 BNW, 2025 WL 3101994, at *3 (D. Nev. Nov. 6, 2025); *Phan v. Beccerra*, No. 2:25-
22 CV-01757, 2025 WL 1993735, at *3 (E.D. Cal. July 16, 2025); *Nguyen v. Hyde*, No.
23 25-cv-11470-MJJ, 2025 WL 1725791, at *3 (D. Mass. June 20, 2025) (citing *Kong v.*
24 *United States*, 62 F.4th 608, 620 (1st Cir. 2023)).

25 Here, none of the prerequisites to detention apply. ICE did not detain
26 Petitioner due to a violation. And there are no changed circumstances that justify
27 re-detaining him. Respondents’ intent to eventually complete a travel document

1 request to remove Petitioner does not constitute a “changed circumstance” under 8
2 C.F.R. § 241.13(i)(2). *Hoac v. Becerra*, No. 2:25-CV-01740-DC-JDP, 2025 WL
3 1993771, at *4 (E.D. Cal. July 16, 2025) (citing *Liu v. Carter*, No. 25-3036-JWL,
4 2025 WL 1696526, at *2 (D. Kan. June 17, 2025)). ICE failed to provide Petitioner
5 with “reasons for revocation,” they failed to allow Petitioner an “opportunity to
6 respond to the reasons for revocation,” and Petitioner was not allowed to “submit
7 any evidence or information” relevant to re-detention and evaluating “any contested
8 facts.” 8 C.F.R. §§ 241.4(l)(1), 241.13(i)(3).

9 “[B]ecause officials did not properly revoke petitioner’s release pursuant to
10 the applicable regulations,” this Court will likely find that “petitioner is entitled to
11 his release” on an order of supervision. *Liu*, 2025 WL 1696526, at *3.

12 **C. Petitioner is likely to succeed on the merits of his claim that he**
13 **is entitled to adequate notice and an opportunity to be heard**
14 **prior to any third country removal (Grounds 4 and 5).**

15 Finally, Petitioner is likely to succeed on the merits of his claim that he may
16 not be removed to a third country absent adequate notice and an opportunity to be
17 heard.

18 U.S. law enshrines protections against dangerous and life-threatening
19 removal decisions. By statute, the government is prohibited from removing an
20 immigrant to any third country where a person may be persecuted or tortured, a
21 form of protection known as withholding of removal. *See* 8 U.S.C. § 1231(b)(3)(A).
22 The government “may not remove [a noncitizen] to a country if the Attorney
23 General decides that the [noncitizen's] life or freedom would be threatened in that
24 country because of the [noncitizen’s] race, religion, nationality, membership in a
25 particular social group, or political opinion.” *Id.*; *see also* 8 C.F.R. §§ 208.16,
26 1208.16. Withholding of removal is a mandatory protection.

27 Similarly, Congress codified protections enshrined in the Convention Against
Torture (CAT) prohibiting the government from removing a person to a country

1 where they would be tortured. *See* FARRA 2681-822 (codified as 8 U.S.C. § 1231
2 note) (“It shall be the policy of the United States not to expel, extradite, or
3 otherwise effect the involuntary return of any person to a country in which there
4 are substantial grounds for believing the person would be in danger of being
5 subjected to torture, regardless of whether the person is physically present in the
6 United States.”); 28 C.F.R. § 200.1; *id.* §§ 208.16-208.18, 1208.16-1208.18. CAT
7 protection is also mandatory.

8 To comport with the requirements of due process, the government must
9 provide notice of the third country removal and an opportunity to respond. Due
10 process requires “written notice of the country being designated” and “the statutory
11 basis for the designation, i.e., the applicable subsection of § 1231(b)(2).” *Aden v.*
12 *Nielsen*, 409 F. Supp. 3d 998, 1019 (W.D. Wash. 2019); *accord D.V.D. v. U.S. Dep’t*
13 *of Homeland Sec.*, No. 25-cv-10676-BEM, 2025 WL 1453640, at *1 (D. Mass. May
14 21, 2025); *Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999).

15 Due process also requires the following: “[A]sk[ing] the noncitizen whether he
16 or she fears persecution or harm upon removal to the designated country and
17 memorialize in writing the noncitizen's response. This requirement ensures DHS
18 will obtain the necessary information from the noncitizen to comply with section
19 1231(b)(3) and avoids [a dispute about what was said].” *Aden*, 409 F. Supp. 3d at
20 1019. “Failing to notify individuals who are subject to deportation that they have
21 the right to apply for asylum in the United States and for withholding of
22 deportation to the country to which they will be deported violates both INS
23 regulations and the constitutional right to due process.” *Andriasian*, 180 F.3d at
24 1041.

25 If the noncitizen claims fear, measures must be taken to ensure that the
26 noncitizen can seek asylum, withholding, and relief under CAT before an
27 immigration judge in reopened removal proceedings. The amount and type of notice

1 must be “sufficient” to ensure that “given [a noncitizen’s] capacities and
2 circumstances, he would have a reasonable opportunity to raise and pursue his
3 claim for withholding of deportation.” *Aden*, 409 F. Supp. 3d at 1009 (citing
4 *Mathews v. Eldridge*, 424 U.S. 319, 349 (1976) and *Kossov v. I.N.S.*, 132 F.3d 405,
5 408 (7th Cir. 1998)); *cf. D.V.D.*, 2025 WL 1453640, at *1 (requiring a minimum of 15
6 days notice).

7 “[L]ast minute” notice of the country of removal will not suffice, *Andriasian*,
8 180 F.3d at 1041; *accord Najjar v. Lunch*, 630 Fed. App’x 724 (9th Cir. 2016), and
9 for good reason: To have a meaningful opportunity to apply for fear-based protection
10 from removal, immigrants must have time to prepare and present relevant
11 arguments and evidence. Merely telling a person where they may be sent, without
12 giving them a chance to look into country conditions, does not give them a
13 meaningful chance to determine whether and why they have a credible fear.

14 Respondents’ third country removal policy skips over these statutory and
15 constitutional procedural protections. According to ICE’s July 9, 2025 Directive,
16 individuals can be removed to third countries “without the need for further
17 procedures,” so long as “the [U.S.] has received diplomatic assurances.”⁵ Petitioner
18 is likely to succeed on the merits of his claim on this fact alone, because the policy
19 instructs officers to provide no notice or opportunity to be heard of any kind. The
20 same is true of the minimal procedures ICE offers when no diplomatic assurances
21 are present. The policy provides no meaningful notice (only 6-24 hours), instructs
22 officers not to ask about fear, and provides no actual opportunity to see counsel and
23 prepare a fear-based claim (6-24 hours), let alone reopen removal proceedings. In
24 sum, it directs ICE officers to violate the rights of those whom they seek to subject
25 to the third country removal program.

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27 ⁵ Amended Petition Ex. 5.

1 Faced with similar arguments, several courts have recently granted
2 individual TROs against removal to third countries. See *Rodriguez-Gutierrez*, No.
3 25-cv-02726-BAS-SBC (S.D. Cal. Nov. 7, 2025) *J.R.*, 2025 WL 1810210; *Vaskanyan*,
4 2025 WL 2014208; *Ortega*, 2025 WL 1771438; *Hoac*, 2025 WL 1993771, at *7; *Phan*,
5 2025 WL 1993735, at *7.

6 Because ICE's new policies for third country removal fail to comply with
7 existing law, they also violate the Administrative Procedures Act. Furthermore,
8 given the blatant unlawfulness and unconstitutionality of ICE's policies,
9 Petitioner's detention under the color of those policies is unlawful.

10 **II. Petitioner will suffer irreparable harm absent injunctive relief.**

11 Petitioner also meets the second factor: irreparable harm. "It is well
12 established that the deprivation of constitutional rights 'unquestionably constitutes
13 irreparable injury.'" *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012)
14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)). Where the "alleged deprivation
15 of a constitutional right is involved, most courts hold that no further showing of
16 irreparable injury is necessary." *Warsoldier v. Woodford*, 418 F.3d 989, 1001-02 (9th
17 Cir. 2005) (quoting 11A Charles Alan Wright et al., *Federal Practice and Procedure*,
18 § 2948.1 (2d ed. 2004)).

19 Here, the potential irreparable harm to Petitioner is even more concrete. He
20 has been unable to marry his fiancé and build a family while detained.⁶ And, on
21 belief, he has been unable to take care of his ailing mother, a U.S. citizen.
22 Furthermore, unlawful detention itself "constitutes extreme or very serious damage,
23 and that damage is not compensable in damages." *Hernandez v. Sessions*, 872 F.3d
24 976, 999 (9th Cir. 2017) (internal citations omitted).

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27 ⁶ ECF No. 1-1 at 19.

1 Third-country deportations pose that risk and more. Recent third-country
2 deportees have been held, indefinitely and without charge, in hazardous foreign
3 prisons.⁷ They have been subjected to solitary confinement.⁸ They have been
4 removed to countries so unstable that the U.S. government recommends making a
5 will and appointing a hostage negotiator before traveling to them.⁹ These and other
6 threats to Petitioner's health and life independently constitute irreparable harm.

7 **III. The balance of hardships and the public interest weigh heavily in**
8 **Petitioner's favor**

9 The final two factors for a TRO—the balance of hardships and public interest—
10 “merge when the Government is the opposing party.” *Nken v. Holder*, 556 U.S.
11 418,435 (2009). That balance tips decidedly in Petitioner's favor.

12 The government “cannot reasonably assert that it is harmed in any legally
13 cognizable sense” by being compelled to follow the law. *Zepeda v. I.N.S.*, 753 F.2d
14 719, 727 (9th Cir. 1983). Moreover, it is always in the public interest to prevent
15 violations of the U.S. Constitution and ensure the rule of law. *See Nken*, 556 U.S. at
16 436 (describing public interest in preventing noncitizens “from being wrongfully
17 removed, particularly to countries where they are likely to face substantial harm”);
18 *Moreno Galvez v. Cuccinelli*, 387 F. Supp. 3d 1208, 1218 (W.D. Wash. 2019) (when
19 government's treatment “is inconsistent with federal law, . . . the balance of
20 hardships and public interest factors weigh in favor of a preliminary injunction.”).

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22 ⁷ Edward Wong et al., *Inside the Global Deal-Making Behind Trump's Mass*
23 *Deportations*, N.Y. Times (Jun. 25, 2025), available at
24 [https://www.nytimes.com/2025/06/25/us/politics/trump-immigrants-](https://www.nytimes.com/2025/06/25/us/politics/trump-immigrants-deportations.html)
[deportations.html](https://www.nytimes.com/2025/06/25/us/politics/trump-immigrants-deportations.html)

25 ⁸ Gerald Imray, *Men deported by US to Eswatini in Africa will be held in*
26 *solitary confinement for undetermined time*, Associated Press (Jul. 18, 2025),
27 available at [https://apnews.com/article/eswatini-united-states-trump-deportation-](https://apnews.com/article/eswatini-united-states-trump-deportation-immigrants-a5853b16b7b275cbcbfe6caff87d0bb8)
[immigrants-a5853b16b7b275cbcbfe6caff87d0bb8](https://apnews.com/article/eswatini-united-states-trump-deportation-immigrants-a5853b16b7b275cbcbfe6caff87d0bb8)

⁹ *See* Wong, *supra*.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on November 24, 2025. I certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third-party commercial carrier for delivery within three calendar days, to the following person:

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