

**CV25-04005-PHX-DJH--ESW**

### PETITION FOR WRIT OF HABEAS CORPUS

Under 28 U.S.C. § 2241 and the Supreme Court's decision in *Zadvydas v. Davis*, 533 U.S. 678 (2001)

From:

Norair Nikogosian



San Luis Regional Detention Center  
406 North Avenue D, San Luis, AZ 85349

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OCT 27 2025	
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

To:

The Honorable Judge

United States District Court for the District of Arizona

Honorable Court,

THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING TO FEDERAL AND/OR LOCAL RULES AND PRACTICES AND IS SUBJECT TO REJECTION BY THE COURT.

REFERENCE LRCWP 5.4  
(Rule Number/Section)

My name is Norair Nikogosian. I have been in ICE custody since August 10, 2024. On March 20, 2025, I was transferred from the Otay Mesa Detention Center (California) to the San Luis Regional Detention Center (Arizona). I respectfully petition this Court for a writ of habeas corpus, as my detention has exceeded 180 days and removal cannot be accomplished within a reasonable period, in violation of *Zadvydas v. Davis*.

#### LEGAL BASIS

In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that immigration authorities cannot detain a noncitizen for more than 180 days after a final removal order if deportation is not reasonably foreseeable. Continued detention violates the Fifth Amendment of the U.S. Constitution.

#### STATEMENT OF FACTS

1. My detention has exceeded 180 days after the removal order became final, and removal has not been carried out.
2. I have fully cooperated with ICE, as evidenced by numerous Deportation Department Request Forms (April–September 2025), a signed Personal Interview Request with interpreter (August 12, 2025, Officer Jorge Hernandez), and written correspondence with Officer Miguel Aguilar.
3. ICE's Notice to Alien of File Custody Review, dated July 16, 2025, explicitly

states that if removal cannot be executed within 90 days, ICE must consider release under an Order of Supervision.

4. I have a reliable U.S. citizen sponsor, Andre Asatryan (Date of Birth: [REDACTED]; [REDACTED]; Passport No. [REDACTED], issued June 1, 2021, valid until May 31, 2031), residing in California and willing to provide housing and supervision upon my release.

RELIEF REQUESTED

1. Declare that my continued detention is unlawful under Zadvydas v. Davis;
2. Order ICE to immediately release me under an Order of Supervision;
3. Consider my full cooperation and the availability of a U.S. citizen sponsor;
4. Grant any other relief that the Court deems just and proper.

EXHIBITS

1. Immigration Judge's Decision (Otay Mesa Immigration Court, March 10, 2025);
2. ICE Notice to Alien of File Custody Review (July 16, 2025);
3. Deportation Department Request Forms (April-September 2025);
4. Personal Interview Request (August 12, 2025);
5. Correspondence with Officer Miguel Aguilar;
6. Sponsor Packet from U.S. Citizen Andre Asatryan;
7. Proof of Money Order payment (\$5.00, Western Union/Walmart).

Respectfully submitted,

Norair Nikogosian

A# [REDACTED]

San Luis Regional Detention Center, AZ

Date: October 20, 2025

Signature: 