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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mohammed IBRAHIM,

A 

Petitioner,

v.

Eric Rokosky, in his official capacity as Warden of Elizabeth Detention Center; RUBEN PEREZ, in his official capacity as Acting Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations Newark Field Office; Todd Lyons, in his official capacity as the Acting Director of U.S. Immigration and Customs Enforcement; and KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security,

Respondents.

Case No.

**VERIFIED PETITION
FOR WRIT OF
HABEAS CORPUS**

APPLICATION FOR ISSUANCE OF ORDER TO SHOW CAUSE

1. Pursuant to 28 U.S.C. § 2243, Petitioner Mohammed Ibrahim, by and through undersigned counsel, respectfully requests that this Court issue an order to Respondents, requiring them to show cause why his Petition for Writ of Habeas Corpus, filed pursuant to 28 U.S.C. § 2241, should not be granted.

2. Petitioner challenges his detention in immigration custody by Respondents, which has become unconstitutionally prolonged in violation of the Due Process Clause of the Fifth Amendment.
3. Therefore, Petitioner requests that the Court order a bond hearing at which the government bears the burden of showing that his continued detention is necessary.
4. The federal habeas corpus statute provides that “a court, justice, or judge entertaining an application for a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” 28 U.S.C. § 2243.
5. Section 2243 further provides that the writ or order to show cause “shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed.”
6. Section 2243 further provides that the court shall hold a hearing on the writ or order to cause within five days of the return, unless for good cause additional time is allowed. There, “the court shall summarily hear and determine the facts, and dispose of the matter as law and justice require.” 8 U.S.C. § 2243.
7. Pursuant to § 2243, Petitioner respectfully requests that the Court immediately issue an Order to Show Cause against Respondents.
8. Petitioner further requests in accordance with § 2243 that this Court require respondents to file a return within three days of the Court’s order, showing cause, if any, why the writ of habeas corpus should not be granted.

Dated: August 1, 2025

Respectfully Submitted,

/s/Robert Jackel

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