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

KOMALPAL SINGH

Petitioner,

v.

Case No. 2:25-cv-17362

JUDITH ALMODOVAR,

**In her official capacity as the
Field Office Director, U.S. Immigration
& Customs Enforcement, New York;**

**APPLICATION FOR ISSUANCE
OF ORDER TO SHOW CAUSE**

JOHN TSOUKARIS

**In his official capacity as the
Field Office Director, U.S. Immigration
& Customs Enforcement, Newark, NJ;**

KRISTI NOEM,

**In her official capacity as Secretary, U.S.
Department of Homeland Security;**

TODD M. LYONS,

**In his official capacity as Acting Director
Of Immigration & Customs Enforcement;
and,**

PAMELA BONDI,

**In her official capacity as Attorney General,
U.S. Department of Justice,
*Respondents***

1. Pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests that this Court “forthwith” issue an order directing Respondents to show cause why the petition of habeas corpus filed by Petitioner pursuant to 28 U.S.C. § 2241 should not be granted.

2. Petitioner challenges his present unlawful detention. *See* Petition for Habeas Corpus, Dkt. No. 1.

3. The federal habeas corpus statute provided that “[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show 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.

4. Section 2443 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.”

5. Section 2443 further provides that the court shall hold a hearing on the writ or order to show cause “not more than five days after the return unless for a good cause additional time is allowed.”

6. In addition, § 2443 states that the court “shall summarily hear and determine the facts, and dispose of the matter as law and justice require.”

7. Pursuant to § 2443, Petitioner requests that the court immediately issue an Order to Show Cause directing Respondents to file a return within three days of the order, showing cause, if any, why the writ of habeas corpus should not be granted, and to provide Petitioner an opportunity to file a reply within three days after Respondents file the return.

Dated: November 11, 2025

Respectfully Submitted,

/s/ Sugandha Dahiya, Esq.
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

KOMALPAL SINGH

Petitioner,

v.

Case No. 2:25-cv-17362

JUDITH ALMODOVAR,

In her official capacity as the
Field Office Director, U.S. Immigration
& Customs Enforcement;

[Proposed]

ORDER TO SHOW CAUSE

JOHN TSOUKARIS

In his official capacity as the
Field Office Director, U.S. Immigration
& Customs Enforcement, Newark, NJ;

KRISTI NOEM,

In her official capacity as Secretary, U.S.
Department of Homeland Security;

TODD M. LYONS,

In his official capacity as Acting Director
Of Immigration & Customs Enforcement;
and,

PAMELA BONDI,

In her official capacity as Attorney General,
U.S. Department of Justice,

Respondents.

Upon consideration of Petitioner's Application for Issuance of Order to Show Cause pursuant to 28 U.S.C. § 2443 and Petitioner's Petition for Writ of Habeas Corpus [Dkt. No. 1],

IT IS HEREBY ORDERED that:

1. Respondents shall file a return on the Order to Show Cause why the Petition for Writ of Habeas Corpus should not be granted by:
2. Petitioner shall have an opportunity to file a reply by:
3. This matter shall be heard by this Court on:
4. Respondents shall be enjoined from moving Petitioner outside the jurisdiction of this Court until this civil action is resolved.
5. Service of this Order shall be made by Petitioner on the United States Attorney for the District of New Jersey.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE