UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MEHRAB RAHIM BHAI, Petitioner, v. PAMELA BONDI, in her capacity as Attorney General of the United States; KRISTI NOEM, in her capacity as Secretary, U.S. Department of Homeland Security; TODD LYONS, in his capacity as Acting Director, U.S. Immigration and Customs Enforcement; PAUL MCBRIDE, in his capacity as Field Office Director, Houston Field Office U.S. Immigration and Customs Enforcement; RANDALL TATE, in his capacity as Warden of the Montgomery Processing Center, Respondents.	Civil Action No. 4:25-cv-5382

PETITION FOR WRIT OF HABEAS CORPUS AND FOR ORDER TO SHOW CAUSE

1. Mehrab Rahim Bhai ("Mr. Bhai" or "Petitioner") respectfully submits this Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 to challenge his ongoing and unlawful detention. In support thereof, Mr. Bhai shows the Court as follows:

I. INTRODUCTION

2. On August 27, 2025, Mr. Bhai was arrested and detained—an act that is only permissible when removal is reasonably foreseeable. There is no evidence that Mr. Bhai's

removal is reasonably foreseeable here. In fact, the nature of this case shows the exact opposite. Twenty-three years ago, Mr. Bhai received his final removal order. He was arrested, detained, and held as a prisoner for more than **five years** before being released under an Order of Supervision.

3. Mr. Bhai has now been arrested and detained *again*, still with no evidence to suggest that removal is reasonably foreseeable or to support a change in circumstance necessitating detention. Mr. Bhai's time in detention is not only presumptively unreasonable, but unlawful. Removal was not reasonably foreseeable when Mr. Bhai was first detained twenty-three years ago, and nothing has changed to suggest that it is reasonably foreseeable today. The Court should release him.

II. JURISDICTION

4. This Court has subject-matter jurisdiction over this Petition under 28 U.S.C. § 2241 (power to grant habeas corpus) and 28 U.S.C. § 1331 (federal question jurisdiction); the All Writs Acts, 28 U.S.C. § 1651; and the Administrative Procedure Act, 5 U.S.C. § 706(2)(A).

5. Pursuant to 28 U.S.C. § 2241, district courts have jurisdiction to hear habeas corpus claims by noncitizens challenging the lawfulness of their detention under federal law. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

III. CUSTODY

6. Mr. Bhai is in the physical custody and under the direct control of Respondents, specifically of the U.S. Immigration and Customs Enforcement ("ICE"). Mr.

Bhai is detained at the Montgomery Processing Center located at 806 Hilbig Rd, Conroe, TX 77301.

IV. VENUE

7. Venue properly lies in the Southern District of Texas – Houston Division because Mr. Bhai is in the custody of Respondents within the District. *See* 28 U.S.C. § 2241(a) (providing for habeas petitions "within [a court's] respective jurisdiction").

V. PARTIES

8. Respondent Pamela Bondi is named in her official capacity as the Attorney General of the United States. She is responsible for the administration of the immigration laws as exercised by the Executive Office for Immigration Review. 8 U.S.C. § 1103(g). She routinely transacts business in the Southern District of Texas and is legally responsible for Mr. Bhai's detention. Therefore, she is the legal custodian[1] of Mr. Bhai.

9. Respondent Kristi Noem is named in her official capacity as the Secretary of the Department of Homeland Security ("DHS"). She is responsible for the administration of ICE and the implementation and enforcement of the Immigration and Nationality Act ("INA"). 8 U.S.C. § 1103(a). She routinely transacts business in the Southern District of Texas and is legally responsible for Mr. Bhai's detention. As such, she is a legal custodian of Mr. Bhai.

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[1] No binding Supreme Court or Fifth Circuit cases have adopted the immediate custodian rule in the removal context. *Rumsfeld v. Padilla* expressly "left open the question whether the Attorney General is a proper respondent to a habeas petition filed by a[] [noncitizen] detained pending deportation." 542 U.S. 426, 435 n.8 (2004). Mr. Bhai is held at a private prison which contracts with the federal government to house immigration detainees at the direction of Respondent. Therefore, Respondent is a proper party because she oversees government agencies and/or offices under whose authority Mr. Bhai is being detained.

10. Respondent Todd Lyons is named in his official capacity as the Acting Director of ICE. As director of ICE, the agency within DHS that detains and removes noncitizens, Respondent Lyons is a legal custodian of Mr. Bhai.

11. Respondent Paul McBride is named in his official capacity as the Field Office Director responsible for the Houston Field Office of ICE with administrative jurisdiction over Mr. Bhai's case. He routinely transacts business within the boundaries of the judicial district of the Southern District of Texas. Pursuant to Respondent McBride's orders, Mr. Bhai remains detained. As such, he is a legal custodian of Mr. Bhai.

12. Respondent Randall Tate is named in his official capacity as the Warden of the Montgomery Processing Center where Mr. Bhai is held. In this capacity, he is a legal custodian of Mr. Bhai.

VI. FACTS

13. Mr. Bhai was born on [redacted] in Hyderabad, Pakistan. He arrived in the United States on March 28, 2001. After being in the United States for approximately nine months, he was arrested and detained pending removal.

14. While in detention, Mr. Bhai received his final removal order on January 30, 2002. Exhibit A. Mr. Bhai filed his first habeas petition on February 24, 2005, in Cause No. 4:05-cv-00625, *Kamran Safdar Ali v. Alberto Gonzales, et al.*, Southern District of Texas, Houston Division. Exhibit B.

15. At the time, Mr. Bhai used a pseudonym: Kamran Safdar Ali. Eventually, however, Mr. Bhai revealed his true identity and on June 15, 2006, he dismissed his habeas petition without prejudice. But Mr. Bhai's story does not end there. After dismissing the

first petition, he remained in detention until May 21, 2007. By that time, Mr. Bhai had spent almost another full year in detention. This puts Mr. Bhai's total time in detention at an overwhelming one-thousand nine-hundred and thirty-seven days—**more than five years**.

16. Finally, Mr. Bhai was released on an Order of Supervision on May 21, 2007, after the government presumably found there was no likelihood of removal in the foreseeable future. Exhibit C. This Order required him to adhere to certain conditions, including: (1) "appear[ing] in person at the time and place specified, upon each and every request of the Service, for identification and for deportation or removal"; (2) "appear[ing] for medical or psychiatric examination" at the request of the Service; (3) "provid[ing] information under oath about [his] nationality, circumstances, habits, associations, and activities"; (4) not traveling outside the "Houston & Greater Metro Area for more than 48 hours without first having notified this Service office of the dates and places of such proposed travel"; (5) "furnish[ing] written notice to this Service office of any change of residence or employment within 48 hours of such change"; (6) reporting in person to the "Service office at: 126 Northpoint Dr. Houston, Texas . . . unless [he was] granted written permission to report on another date"; (7) assist[ing] the Immigration and Naturalization Service in obtaining any necessary travel documents"; and (8) "participat[ing] in the Radio Frequency Monitoring Program." *Id.*

17. Mr. Bhai followed every condition of his release. As noted in the list above, one of those conditions was to report to the ICE Office when required. Like he had done for 18 years after he was released from his first detention, Mr. Bhai reported for his yearly

check-in on July 22, 2025. It was at this appointment that Mr. Bhai was informed that he no longer needed to show up for his yearly reporting.

18. Two days later, Mr. Bhai received a notice to return to the ICE Office for "removal." Exhibit D. Again, Mr. Bhai complied with the request.

19. When Mr. Bhai showed up for his August 27, 2025, appointment, however, he was immediately handcuffed and detained. He was then taken to the Montgomery Processing Center where he has been detained ever since.

VII. AUTHORITY AND ARGUMENT

20. The INA, 8 U.S.C. § 1231, governs the detention of noncitizens "during" and "beyond" the "removal period." The "removal period" begins once a noncitizen's removal order "becomes administratively final." 8 U.S.C. § 1231(a)(l)(B)(i). A removal order "becomes administratively final" at the earlier of two points: (1) "a determination by the Board of Immigration Appeals affirming such order," or (2) "the expiration of the period in which the [noncitizen] is permitted to" petition the Board of Immigration Appeals for review of the order. 8 U.S.C. § 1101(a)(47)(B). Because a noncitizen cannot seek review of a final administrative removal order before an immigration judge or the Board of Immigration Appeals, the order becomes final immediately upon issuance. *Riley v. Bondi,* 145 S. Ct. 2190, 2198 (2025).

21. The removal period lasts for 90 days, during which ICE "shall remove the [noncitizen] from the United States" and "shall detain the [non-citizen]" as it carries out the removal. 8 U.S.C. § 1231(a)(1)–(2). If ICE does not remove the noncitizen within the 90-day removal period, the noncitizen "*may* be detained beyond the [90-day] removal

period" if they meet certain criteria, such as being a risk to the community or unlikely to comply with the order of removal. 8 U.S.C. § 1231(a)(6) (emphasis added).

22. In *Zadvydas*, the Supreme Court held that "the statute, read in light of the Constitution's demands, limits [a noncitizen's] post-removal-period detention to a period reasonably necessary to bring about that [noncitizen's] removal from the United States." *Zadvydas*, 533 U.S. at 689. "[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute." *Id.* at 699. Six months of post-removal order detention is considered "presumptively reasonable." *Id.* at 701.

23. Importantly, if a person has been detained more than six months following the initiation of their removal period, their detention is presumptively unreasonable unless deportation is reasonably foreseeable; otherwise, it violates that noncitizen's due process right to liberty. *Id.* at 690. In such a circumstance, if the noncitizen "provides good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future," the burden shifts to the government to justify continued detention. *Id.* at 701. Thus, under *Zadvydas*, "if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute." *Id.* at 699–700.

24. A noncitizen may be released from custody under conditions of supervision if DHS determines that the individual is not significantly likely to be removed in the reasonably foreseeable future; the person is not a danger to the community or a flight risk; and the conditions of supervision can mitigate any concerns regarding compliance or safety. 8 C.F.R. § 241.4(e). If a noncitizen is released pursuant to 8 C.F.R. § 241.4(e), they must be released pursuant to an Order of Supervision. 8 C.F.R. § 241.5(a). The Order of

Supervision specifies conditions of release, which generally include routine check-ins and the requirement to notify DHS with relevant information under oath as directed. *Id.* at 241.5(a)(1).

25. Once a noncitizen is released under an Order of Supervision, DHS may revoke an Order of Supervision and return a noncitizen into custody if the noncitizen has violated their conditions, the discovery of previously unknown information indicates the individual poses a danger or flight risk, or a change in circumstances warrants detention. 8 C.F.R. § 241.4(l)(1)–(2). Upon revocation, the noncitizen must receive written notification specifying the reasons for the revocation and the factual basis. *Id.* After being returned to custody, the noncitizen must be promptly afforded an initial informal interview and given an opportunity to respond to the reasons for revocation. *Id.* § 241.4(1)(1).

26. Mr. Bhai received his final removal order on January 30, 2002. Exhibit A. The 90-day removal period in which ICE "shall remove [him] from the United States" terminated on April 30, 2002. 8 U.S.C. § 1231(a)(1)(A). At the end of the removal period, however, Mr. Bhai was not released from detention.

27. While a non-citizen "may be detained beyond the [90-day] removal period" if they meet certain criteria, such as being "a risk to the community or unlikely to comply with the order of removal," there is no evidence of that here. 8 U.S.C. § 1231(a)(6). Mr. Bhai has not committed any crimes, nor is there any realistic argument that he would not comply with an order of removal such that detention would be necessary. In fact, Mr. Bhai willingly showed up to the ICE Office on August 27, 2025, after receiving a notice of removal. If anything, this shows Mr. Bhai *would* comply.

28. After the termination of the 90-day removal period—in Mr. Bhai's case, April 30, 2002—post-removal detention is limited to a period in which removal is reasonably foreseeable. *Zadvydas*, 533 U.S. at 689. While six months of post-removal order detention is considered "presumptively reasonable," *id.* at 701, Mr. Bhai's time in detention has far exceeded that time.

29. It is true, however, that "[t]he removal period shall be extended beyond a period of 90 days and the alien may remain in detention during such extended period if the alien fails or refuses to make timely application in good faith for travel or other documents necessary to the alien's departure or conspires or acts to prevent the alien's removal subject to an order of removal." 8 U.S.C. § 1231(a)(1)(C). Mr. Bhai concedes that much of the time he spent in detention was under a pseudonym: Kamran Safdar Ali. But that is of no consequence here. *Even if* the removal period did not start until Mr. Bhai dismissed his first habeas petition on June 15, 2006, after his true identity was revealed, Mr. Bhai's time in detention is *still* presumptively unreasonable. Mr. Bhai was kept in detention until May 21, 2007—approximately a year later. Therefore, Mr. Bhai has clearly surpassed the 6-month period of presumptively reasonable detention.

30. Any time Mr. Bhai now spends in detention where there is no likelihood of removal is presumptively unreasonable. This includes not only the year in detention that Mr. Bhai was forced to endure nearly twenty years ago, but also the time he has spent in detention the second time—from August 27, 2025, to present. The government must justify this prolonged detention. But it has not and cannot.

31. On October 15, 2025, counsel for Mr. Bhai asked his Deportation Officer, Crystal Salinas, whether there had been a change in the likelihood of Mr. Bhai's removal to Pakistan. Exhibit E. The following day, Ms. Salinas responded with a conclusory statement: "There is currently a significant likelihood of removal in the foreseeable future." *Id.* That is no justification at all.

32. Notably, ICE previously released Mr. Bhai on an Order of Supervision, in part, due to the inability to obtain a travel document from Pakistan. Exhibit C. In fact, for **twenty-three years**, and certainly since his release in May 2007, Respondents have been unable or unwilling to remove Mr. Bhai. Respondents have provided no evidence to suggest that fact has changed in any way. It is without dispute: Mr. Bhai is not a flight risk or a danger to the community. And Respondents have failed to produce *any* evidence that Mr. Bhai's removal is reasonably foreseeable or that there has been any change in circumstance necessitating detention. *Zadvydas* is clear: "once removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute." *Zadvydas*, 533 U.S. at 699. Because it is not authorized here, Mr. Bhai should be released.

VIII. CLAIMS FOR RELIEF

A. COUNT ONE – Violation of the Immigration and Nationality Act, 8 U.S.C. § 1231

33. Mr. Bhai re-alleges and incorporates by reference the paragraphs above as if fully set forth herein.

34. As described above in greater detail, Mr. Bhai's removal period began on January 30, 2002. Exhibit A. Ninety days after that—on April 30, 2002—the period in

which Respondents were to remove Mr. Bhai terminated. But Mr. Bhai was kept in detention until May 21, 2007—approximately five years later.

35. Again, Mr. Bhai concedes that the removal period may be extended due to his use of a pseudonym. 8 U.S.C. § 1231(a)(1)(C). But even if the government counts only the time Mr. Bhai spent in detention after he revealed his true identity, such that the removal period did not begin until after he revealed his true name and dismissed his habeas petition on June 15, 2006, Mr. Bhai's time in detention is *still* presumptively unreasonable. Mr. Bhai was kept in detention until May 21, 2007, almost another full year. Therefore, even under a very conservative approach to counting Mr. Bhai's time in detention, he has clearly surpassed the 6-month period of presumptively reasonable detention. Any time Mr. Bhai spends in detention is now presumptively unreasonable.

36. Respondents have presented no evidence that Mr. Bhai's removal is reasonably foreseeable. Nor have they presented any evidence of a change in circumstance necessitating detention. Mr. Bhai's Deportation Officer merely stated that "[t]here is currently a significant likelihood of removal in the foreseeable future." Exhibit E. But simply alleging a conclusory statement does not make it so.

37. Mr. Bhai requests that the Court use its authority under 28 U.S.C. § 2243 to order the Respondents to file a return within three days, unless they can show good cause for additional time. *See* 28 U.S.C. § 2243 (stating that an order to show cause why a petition for writ of habeas corpus should be denied is returnable "within three days unless for good cause additional time, not exceeding twenty days, is allowed"). Courts frequently issue such orders to show cause for the government to respond to habeas petitions by individuals

in immigration detention. *See, e.g., Diallo v. Pitts*, Civil Action No. 1:19-cv-216, 2020 WL 714274, at *1 (S.D. Tex. Jan. 15, 2020); *Abdulle v. Gonzales*, 422 F. Supp. 2d 774, 775–76 (W.D. Tex. 2006) (Briones, J.); *D.G.L. v. Collins*, No. A-20-cv-1126-RP-SH, 2020 WL 10355163, at *1–2 (W.D. Tex. Nov. 18, 2020) (Hightower, M.J.).

B. COUNT TWO – Violation of Due Process Clause of the Fifth Amendment of the U.S. Constitution

38. Mr. Bhai re-alleges and incorporates by reference the paragraphs above as if fully set forth herein.

39. Mr. Bhai received his final removal order on January 30, 2002. After being detained for **more than 5 years**, he was finally released on May 21, 2007, on an Order of Supervision. Exhibit C. But again, even if Mr. Bhai's removal period did not begin until after he dismissed his first habeas petition on June 15, 2006, he *still* has been detained for far longer than the 90-day statutorily authorized "removal period" pursuant to 8 U.S.C. § 1231(a)(1)(A). Mr. Bhai was not released from detention until May 21, 2007—approximately a year after he revealed his true identity and dismissed his first habeas petition. Even under a very conservative approach, Mr. Bhai has far exceeded the presumptively reasonable post-removal detention period. In fact, he has been detained more than double the amount of time that is considered presumptively reasonable.

40. Now, Mr. Bhai has been arrested and detained for a *second* time. On August 27, 2025, Mr. Bhai was arrested and taken to the Montgomery Processing Center where he has remained in detention ever since. Mr. Bhai's time in detention far exceeds the presumptively reasonable 6-month post-removal order detention. Mr. Bhai's time in

detention is presumptively unreasonable; there is no evidence that his removal is reasonably foreseeable.

41. Mr. Bhai's detention violates the Due Process Clause. The Due Process Clause of the Fifth Amendment forbids the government from depriving any "person" of liberty "without due process of law." U.S. Const. amend V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty" that the Due Process Clause protects. *Zadvydas*, 533 U.S. at 690 (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)). "[T]he Due Process Clause applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent." *Id.* at 693. For this reason, even "removable and inadmissible aliens are entitled to be free from detention that is arbitrary and capricious." *Id.* at 721 (Kennedy, J., dissenting).

42. Civil immigration detention violates due process if it is not reasonably related to its statutory purpose. *See id.* at 690 (citing *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). Mr. Bhai's detention, which has lasted beyond the end of the statutorily authorized removal period, and which is likely to continue indefinitely, is clearly not reasonably related to the primary statutory purpose of ensuring imminent removal.

43. Because Respondents have not produced any evidence that removal is imminent or realistically achievable, continued detention under these circumstances is arbitrary and violates Mr. Bhai's substantive due process rights.

C. COUNT THREE – Arbitrary and Capricious Agency Action under the Administrative Procedure Act, 5 U.S.C. § 706(2)(A)

44. Mr. Bhai re-alleges and incorporates by reference the paragraphs above as if fully set forth herein.

45. Under *Accardi v. Shaughnessy*, agencies are bound to follow their own rules that affect the fundamental rights of individuals, even self-imposed policies and processes that limit otherwise discretionary decisions. 347 U.S. 260, 268 (1954); *Morton v. Ruiz*, 415 U.S. 199, 235 (1974) ("Where the rights of individuals are affected, it is incumbent upon agencies to follow their own procedures . . . even where the internal procedures are possibly more rigorous than otherwise would be required.").

46. When agencies fail to adhere to their own policies as required by *Accardi*, courts typically frame the violation as arbitrary, capricious, and contrary to law under the APA, *see Damus v. Nielson*, 313 F. Supp. 3d 317, 337 (D.D.C. 2018) ("It is clear, moreover, that [*Accardi*] claims may arise under the APA"), or as a due process violation, *see Sameena Inc. v. United States Air Force*, 147 F.3d 1148, 1153 (9th Cir. 1998) ("An agency's failure to follow its own regulations tends to cause unjust discrimination and deny adequate notice and consequently may result in a violation of an individual's constitutional right to due process.") (internal quotations omitted). Prejudice is generally presumed when an agency violates its own policy. *See Montilla v. INS,* 926 F.2d 162, 169 (2d Cir. 1991) ("We hold that an alien claiming the INS has failed to adhere to its own regulations . . . is not required to make a showing of prejudice before he is entitled to relief. All that need be shown is that the subject regulations were for the alien's benefit and that the INS failed to

adhere to them."); *US v. Heffner*, 420 F.2d 809, 813 (4th Cir. 1969) ("The *Accardi* doctrine furthermore requires reversal irrespective of whether a new trial will produce the same verdict.").

47. To remedy an *Accardi* violation, a court may direct the agency to properly apply its policy, *see Damus,* 313 F. Supp. 3d at 343 ("[T]his Court is simply ordering that Defendants do what they already admit is required"), or a court may apply the policy itself and order relief consistent with the policy. *See Jimenez v. Cronen,* 317 F. Supp. 3d 626, 657 (D. Mass. 2018) (scheduling bail hearing to review petitioners' custody under ICE's standards because "it would be particularly unfair to require that petitioners remain detained . . . while ICE attempts to remedy its failure"). Courts must "hold unlawful and set aside agency action" that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706(2)(A).

48. DHS has implemented regulations stating that upon revocation of release, the noncitizen will be notified of the reasons for the revocation and ICE shall conduct an information interview promptly after their return to ICE custody to afford the noncitizen an opportunity to respond to and dispute the reasons underlying the revocation. 8 C.F.R. § 241.4(l)(1). Those requirements have not been met here.

49. Mr. Bhai has not been afforded an initial interview to challenge the reasons for his detention, nor has he been given the reasons for his detention. Because the agency has failed to follow its own procedures and regulations, its action should be set aside. *See Villanueva v. Tate*, No. CV H-25-3364, 2025 WL 2774610, at *11–12 (S.D. Tex. Sept. 26, 2025).

IX. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

(1) Assume jurisdiction over this matter;

(2) Order Respondents to show cause why the writ should not be granted within three days, and set a hearing on this Petition within five days of the return, as required by 28 U.S.C. § 2243;

(3) Declare that Petitioner's continued detention violates the Immigration and Nationality Act, 8 U.S.C. § 1231(a)(6); the Administrative Procedure Act, 5 U.S.C. § 706(2)(A); and/or the Due Process Clause of the Fifth Amendment to the U.S. Constitution;

(4) Order Petitioner's immediate release and be restored to his Order of Supervision previously imposed before his detention; and

(5) Grant such further relief as the Court deems just and proper.

Dated: November 11, 2025

Respectfully submitted,

BRACEWELL LLP

/s/ Alamdar S. Hamdani

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ATTORNEYS FOR MEHRAB RAHIM BHAI

VERIFICATION OF SOMEONE ACTING ON PETITIONER'S BEHALF PURSUANT TO 28 U.S.C. § 2242

I am submitting this verification on behalf of Petitioner because I am Petitioner's attorney. I, Alamdar S. Hamdani, and others working under my supervision have discussed with Petitioner the events described in the Petition. I hereby certify that the statements made in this attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

/s/ Alamdar S. Hamdani
Alamdar S. Hamdani
Date: November 11, 2025

CERTIFICATE OF SERVICE

The undersigned certifies that on November 11, 2025, the foregoing document was electronically submitted with the clerk of the court for the United States District Court, Southern District of Texas, using the electronic case file system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Alamdar S. Hamdani
Alamdar S. Hamdani