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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 **SAMIR PAUDEL,**
12 **Petitioner,**

13 **v.**

14 **KRISTI NOEM, Secretary of the**
15 **Department of Homeland Security,**
16 **PAMELA JO BONDI, Attorney General,**
17 **TODD M. LYONS, Acting Director,**
18 **Immigration and Customs Enforcement,**
19 **JESUS ROCHA, Acting Field Office**
20 **Director, San Diego Field Office,**
CHRISTOPHER LAROSE, Warden at
Otay Mesa Detention Center,
21 **Respondents.**

CIVIL CASE NO.: 25-cv-3174-AGS

Traverse in Support of
Petition for a Writ of
Habeas Corpus

&

Reply in Support of Motion for a
Temporary Restraining Order

21 On November 17, 2025, Samir Paudel filed a habeas petition after the
22 government detained him without removing him for over eight months. On
23 December 1, 2025, the government filed a response stating that ICE has obtained a
24 travel document for Mr. Paudel and that he is scheduled to be removed around
25 December 7, 2025. Doc. 9.

26 The supporting ICE declaration shows egregious delays in seeking travel
27 documents for Mr. Paudel. Federal law charges ICE with avoiding unnecessary
28 detention by effectuating removal within 90 days. 8 U.S.C. § 1231(a). But here,

