

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

UNITED STATES DISTRICT COURT
for the

OCT 29 2025

CLERK, U.S. DISTRICT COURT
By CK
Deputy

GHOLESTANI, EHSAN
Petitioner

v.

Case No. 8-25CV2980-X
(Supplied by Clerk of Court)

United States District Court
Respondent
(name of warden or authorized person having custody of petitioner)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

- (a) Your full name: GHOLESTANI, EHSAN
(b) Other names you have used: NA
- Place of confinement:
(a) Name of institution: Cimarron Correctional Facility
(b) Address: 3200 S. Kings Hwy Cushing, OK 74023
- (c) Your identification number: A# ~~XXXXXX~~
Are you currently being held on orders by:
 Federal authorities State authorities Other - explain:
- Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you: _____
(b) Docket number of criminal case: NA
(c) Date of sentencing: _____
 Being held on an immigration charge
 Other (explain): _____

Decision or Action You Are Challenging

- What are you challenging in this petition:
 How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (explain): _____

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: EL PASO, TX

(b) Docket number, case number, or opinion number: ~~XXXXXXXXXX~~

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

I have final order deportation from the Immigration judge.

(d) Date of the decision or action: 02/05, 2025

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

- Yes
- No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal: _____

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

- Yes
- No

9. If you did appeal, give the following information for each appeal:

a. (1) Name of court and docket or case number:

(2) Result and date of result: _____

(3) Grounds raised (list each):

(a) _____

(b) _____

(c) _____

(d) _____

b. (1) Name of court and docket or case number:

(2) Result and date of result: _____

(3) Grounds raised (list each):

(a) _____

(b) _____

(c) _____

(d) _____

10. State concisely every ground on which you claim that you are held unlawfully. Summarize briefly the facts supporting each ground. If necessary, attach a single page only behind page 6.

CAUTION: If you fail to set forth all grounds in this petition, you may be barred from presenting additional grounds at a later date. You must state facts, not conclusions, in support of your grounds. Do not argue or cite law. Just state the specific facts that support your claim. Legal arguments and citation to cases or law should be presented in a separate memorandum.

a. GROUND ONE:

violation of 8 U.S.C. § 1231(a)(6)

Supporting facts: I have been detained by ICE beyond the removal period authorized by statute. ICE is not likely to remove me in the near future.

b. GROUND TWO:

violation of the due process clause of the Fifth Amendment To the U.S. Constitution.

Supporting facts: ICE is depriving me of my right to liberty. I have been detained by ICE for a prolonged period.

c. **GROUND THREE:** _____

Supporting facts: _____

d. **GROUND FOUR:** _____

Supporting facts: _____

11. Relief sought in this petition: Order my immediate release from
ICE custody

12. Have you filed a previous application or petition for habeas corpus or any other application, petition or motion with respect to the grounds raised in this petition?

Yes No

13. If your answer to Question No. 12 is yes, give the following information as to each previous application, petition, or motion:

a. (1) Name of court and docket or case number: _____

(2) Result and date of result: _____

(3) Grounds raised (list each):

(a) _____

(b) _____

(c) _____

(d) _____

b. (1) Name of court and docket or case number: _____

(2) Result and date of result: _____

(3) Grounds raised (list each):

(a) _____

(b) _____

(c) _____

(d) _____

14. If applicable, state whether you have filed a motion under 28 U.S.C. § 2255, and if you filed such a motion and it was denied, state why your remedy by way of such motion is inadequate or ineffective to test the legality of your detention.

15. Are you presently represented by counsel? Yes No
- If so, name, address and telephone number of attorney: _____

16. If you are seeking leave to proceed *in forma pauperis*, have you completed an application setting forth required information? Yes No

Wherefore, Petitioner prays that the Court grant him the relief to which he may be entitled.

Signature of Attorney (if any)

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct and that this Petition for a Writ of Habeas Corpus was placed in the prison mailing system on

10, 09, 2025 (month, day, year).

Executed (signed) on _____ (date).

Signature of Petitioner (required)

Petitioner's current address:

Cimarron Correctional Facility
- 3200 S. Kings Hwy
Cushing, OK 74023
