

UNITED STATES DISTRICT COURT

Eastern DISTRICT OF PENNSYLVANIA

MAMADOU CAMARA
Petitioner,

A



v.

IMMIGRATION CUSTOMS ENFORCEMENT (ICE)
MOSHANNON VALLEY PROCESSING CENTER
Respondent.



Civil Action No.: _____

PETITION FOR WRIT OF HABEAS CORPUS

PURSUANT TO 28 U.S.C. § 2241

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the Petitioner, **MAMADOU CAMARA**, by Cornelia Weathers, ACANA, and respectfully submits this Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241, and in support thereof states the following:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 2241 because Petitioner is in federal immigration detention and challenges the legality of that detention.
2. Venue is proper in this district under 28 U.S.C. § 1391 because Petitioner is currently detained at **MOSHANNON VALLEY PROCESSING CENTER**, which is located within this district.

II. PARTIES

3. **Petitioner: MAMADOU CAMARA** is currently incarcerated at **MOSHANNON VALLEY PROCESSING CENTER, PHILIPBERG, PA**, which is 4 hours by car from his home and family in Philadelphia, PA.

4. **Respondent: IMMIGRATION CUSTOMS ENFORCEMENT**, in their official capacity.
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III. GROUNDS FOR RELIEF

5. Petitioner is entitled to relief under § 2241 because;
 - o The petitioner was informed that the Immigration court could not grant Bond.

A. Detention Without Bond Hearing (for 1226(a) or 1226(c))

6. Petitioner has been detained for over 10 days without a bond hearing, in violation of their due process rights under the Fifth Amendment.
7. Under *Zadvydas v. Davis* and related case law, prolonged immigration detention without individualized review violates the Constitution.
8. There is significant likelihood that Petitioner will be removed in the reasonably foreseeable future.

C. Denial of Bond Hearing / Improper Mandatory Detention

9. ICE has classified Petitioner as subject to mandatory detention under 8 U.S.C. § 1226(c), even though Petitioner does not fall under the categories enumerated in that statute.
 10. Alternatively, even if § 1226(c) applies, Petitioner is entitled to a bond hearing due to prolonged detention.
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IV. STATEMENT OF FACTS

MAMADOU CAMARA was apprehended during a regularly scheduled ICE appointment September 25, 2025.

11. He has had a Master's hearing October 9, 2025. He has an Individual hearing scheduled for December 1, 2025. Prior to his apprehension his Individual hearing would have been scheduled for April 26, 2026.

12. He is a citizen of Mauritania. His languages are Soninke and French. He arrived in this country November 23, 2023 at Lukeville, Arizona. He has a significant language barrier in detention.

13. He had kept all his prior appointments. He has a pending Asylum Petition I 589 filed January 29, 2024. The petition was asking for Withholding of Removal, Asylum, and Convention Against Torture.

14. The petitioner has lived in the Pennsylvania since arriving in the United States.

15. He has family here in this country; a brother, cousins and other extended family. The family has been active in attempting to secure his release.

V. EXHAUSTION OF ADMINISTRATIVE REMEDIES

16. Petitioner has filed for a bond hearing. The request was denied. Please see attached. He was apprehended September 25, 2025. He had a Master's hearing, and has an individual hearing scheduled for December 1, 2025.

VI. RELIEF REQUESTED

17. Petitioner respectfully requests that this Court:
- a. Issue a Writ of Habeas Corpus directing Respondent to release the Petitioner.
 - b. Grant any other relief the Court deems just and proper.

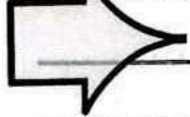
VII. VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 11 day of 24, 2025. Respectfully submitted,

MAMADOU CAMARA

Re: No. A 





**SIGN
& DATE**

Certificate of Service

I hereby certify that a copy of the foregoing Petition has been mailed to the U.S. Attorney for the EASTERN DISTRICT OF PENNSYLVANIA, on this 11 day of 24, 2025.