

MANPREET SINGH GAHRA, ESQ. (CA BAR NO. 194617)
GAHRA and GOSWAMI
P.O. BOX 11717
PLEASANTON, CA 94588
PHONE: (510) 841-4582, FAX: (510) 217-6847
E-MAIL: manpreet@gahralaw.com

Attorney for Petitioner

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA.
BAKERSFIELD, CA

JIWAN SINGH

Petitioner,

v.

SERGIO ALBARRAN, Field Office Director
of Enforcement and Removal Operations, **ERO**
San Francisco Field Office, Immigration and
Customs Enforcement; **Kristi NOEM**,
Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; **Todd M. Lyons**,
Acting Director of the United States
Immigration and Customs Enforcement;
Pamela BONDI, U.S. Attorney General;
EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW; **Warden**, California City Corrections
Center

Respondents

Case No.

**PETITION FOR WRIT OF HABEAS
CORPUS UNDER 28 U.S.C. § 2241
AND COMPLAINT FOR
INJUNCTIVE
AND DECLARATORY RELIEF**

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby moves
2 the Court for emergency relief in the form of a temporary restraining order directing Respondents
3 to release Petitioner from his custody with no additional conditions of release that were not
4 imposed prior to his detention in 2025 or to provide Petitioner with individualized bond hearing
5 before an immigration judge pursuant to 8 U.S.C. § 1226(a).

6 Petitioner also seeks a temporary restraining order enjoining the Respondents from
7 relocating Petitioner outside of the Eastern District of California pending final resolution of this
8 case. Transfer outside this District would impede the Court's jurisdiction over the habeas petition,
9 frustrate Petitioner's access to counsel, and risk mooted the requested relief. The Eastern District
10 of California is the district of confinement, and habeas jurisdiction attaches to the immediate
11 custodian. Any transfer during pendency of this action would defeat the Court's ability to provide
12 effective relief. Courts in this District routinely prohibit such transfers in immigration habeas
13 matters.

14
15 Petitioner further moves for the issuance of an order to show cause as to why a preliminary
16 injunction should not issue.

17 This application is supported by the Memorandum of Points and Authorities,
18 accompanying exhibits, as well as any additional submissions that may be considered by the Court.

19 Undersigned counsel has contacted the Paralegal of U.S. Attorney, Cheri Buxbaum,
20 (Cheri.Buxbaum@usdoj.gov) to know who will be assigned to the matter and ascertain
21 Respondents' position regarding the TRO and is awaiting their reply.

22
23 Respectfully submitted,

24 Date: December 11, 2025

25
/s/ Manpreet Singh Gahra
MANPREET SINGH GAHRA, ESQ.

GAHRA and GOSWAMI
P.O. BOX 11717
PLEASANTON, CA 94588
ATTORNEY FOR PETITIONER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PROOF OF SERVICE

I, the undersigned, declare that my office is in Pleasanton, California. I am over the age of eighteen (18) years and not a party to the action within. On December 11, 2025, I served the following documents: **PETITIONER'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE** by placing a true and correct copy in a sealed envelope, each addressed as follows:

Sergio Albarran,
Field Office Director
ERO San Francisco Field Office,
U.S. Immigration and Customs Enforcement

Todd M. Lyons
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Kristi Noem
U.S. Department of Homeland Security
2801 Nebraska Avenue NW
Washington, D.C. 20528

Pamela Jo Bondi
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

Civil Process Clerk
U.S. Attorney's Office
501 I St, Suite 10-107
Sacramento, CA 95814

Warden,
California City Corrections Center
22844 Virginia Boulevard
California City, CA 93505

By mail. I am readily familiar with the business for collection and processing of correspondence for mailing in the United States Postal Service and that this document, with

1 postage fully prepaid, will be deposited with the United States Postal Service this date in the
2 ordinary course of business.

3 I declare under the penalty of perjury that the foregoing is true and correct. Executed on
4 December 11, 2025, at Pleasanton, California.

5 s/ Manpreet Singh Gahra
6 MANPREET SINGH GAHRA, ESQ.
7 GAHRA and GOSWAMI
8 P.O. BOX 11717
9 PLEASANTON, CA 94588
10 ATTORNEY FOR PETITIONER
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25