

1 Neda Zaman  
2 Cal Bar: 204593  
3 Law Offices of Neda Zaman  
4 16946 Ventura Boulevard  
5 Encino, California 91316  
6 Tel: (818) 290-3625  
7 Tel: (310) 508-8943  
8 Email: Neda@Nedalaw.com  
9 Counsel for Petitioner

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION

**Arpineh Kamali-Masihi**

5:25-cv-03368-SB-PVC

**Petitioners,**

**Ernest Santacruz, in his official capacity  
as Field Office Director, ICE, Los Angeles  
Field Office, et al**

**Respondents**

---

**MOTION FOR ISSUANCE OF ORDER TO SHOW CAUSE**

1. Pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests that the Court issue

1 an order requiring Respondents to show cause as to why the Petition for Writ of  
2 Habeas Corpus should not be granted and why the Court should not order  
3 Petitioner's immediate release from Immigration and Customs Enforcement (ICE)  
4 custody.

5 2. Petitioner was ordered removed from the United States to Iran on or about June 30,  
6 2009. She was released from custody and was required to check-in with the  
7 Department of Homeland Security on quarterly basis for the first year, and annually  
8 every year thereafter. On June 24, 2025, Respondents revoked Petitioner's custody,  
9 for no cause, and placed her back in Respondent's custody.

10 3. In her Petition for Writ of Habeas Corpus, Petitioner challenges her continued  
11 detention by ICE as unlawful under the Immigration and Nationality Act; as arbitrary  
12 and capricious under the Administrative Procedure Act; and in violation of his due  
13 process rights. To remedy these violations, she seeks immediate release from custody.

14 4. Petitioner has four minor children whom she is the primary caretaker. Her children  
15 all United States citizens, are being harmed because of prolonged unreasonable  
16 detention.

17 5. The federal habeas corpus statute provides that "[a] court, justice or judge  
18 entertaining an application for a writ of habeas corpus shall forthwith award the writ  
19 or issue an order directing the respondent to show cause why the writ should not be  
20 granted, unless it appears from the application that the applicant or person detained is  
21 not entitled thereto." 28 U.S.C. § 2243.

22 6. The Petition was filed on December 15, 2025.

23 7. Section 2243 mandates that the writ or order to show cause "shall be returned  
24 within three days unless for good cause additional time, not exceeding twenty days, is  
25 allowed." (emphasis added). It also provides that the Court "shall summarily hear  
26 and determine the facts and dispose of the matter as law and justice require."

27 8. Section 2243 further requires that the Court promptly hold a hearing on the Writ or  
28

1 on Order to Show Cause. The Petitioner does not seek a hearing on the Motion for  
2 Issuance of Order to Show Cause, but she does seek a prompt hearing on the petition  
3 itself.

4 6. Pursuant to 28 U.S.C. § 2243 and given that Petitioner has been re-detained in  
5 Respondent's custody for more than 90 days after revocation of previous custody  
6 determination in 2009, without cause, and in violation of law, Petitioner respectfully  
7 requests that the Court immediately issue an order requiring Respondents to promptly  
8 show cause, if any, why the writ of habeas corpus should not be granted.

9  
10 7. Specifically, Petitioner requests that the Court order Respondents to respond within  
11 seven days, with Petitioner's reply due five days thereafter, and that the Court set a  
12 hearing on the writ for within five days of Petitioner's reply.

13  
14 Dated: December 16, 2025

15  
16  
17 Respectfully submitted,

18  
19 //Neda Zaman//

20 \_\_\_\_\_  
21 Neda Zaman  
22 Attorney for Petitioner  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

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  
26  
27  
28

I, undersigned counsel, hereby certify that I filed this Motion for Issuance of Order to Show Cause and all attachments using the CM/ECF system, which will send notice of this filing to all participants in this case.

Dated: December 16, 2025

Respectfully submitted,

//Neda Zaman//

\_\_\_\_\_  
Neda Zaman  
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  
26  
27  
28