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Name: Jorge Luis Lopez-Sainz
A Number: ~~XXXXXXXXXX~~
Address: 1600 Dowling Rd.
Florence Az. 85132

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CLERK U.S. DISTRICT COURT
DISTRICT OF ARIZONA
BY _____ DEPUTY

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Name: Jorge Luis Lopez-Sainz

Petitioner,

Case No. CV25-04670-PHX-JJT--MTM

^v
K. Bourne (ICE officer in charge)
Luis de la Rosa (Florence Det. Center)
John Cantu (US Immigration and
Custom Enforcement)
Todd M. Lyons (Director US Immig
and Custom Enforcement)
Keristi Noem (Secretary US DHS)
Pam Bondi (US A.G.)
Respondents.

MOTION FOR APPOINTMENT OF
COUNSEL PURSUANT TO 18
U.S.C. § 3006A

Petitioner (name) Jorge Lopez-Sainz has filed a petition for writ of
habeas corpus under 28 U.S.C. § 2241 challenging Petitioner's indefinite detention by
Respondents. Petitioner was detained by Immigration and Customs Enforcement (ICE) on or
about (date) 6-22-2025. Petitioner has remained in ICE custody since that
date. An Immigration Judge ordered Petitioner removed and Petitioner's removal order became
final on or about (date) 4-7-2008, but ICE has been unable to remove
Petitioner.

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In *Zadvydas v. Davis*, the Supreme Court held that the immigration statute 8 U.S.C. § 1231(a)(6) does not allow ICE to detain a noncitizen indefinitely while attempting to carry out removal. 533 U.S. 678, 689 (2001). After six months of presumptively-reasonable detention, if the noncitizen provides good reason to believe that removal is not reasonably foreseeable, the burden shifts to the government to rebut that showing. *Id.* at 701.

Petitioner moves the Court to appoint counsel to represent Petitioner in this case. The Court may appoint counsel in a habeas action when the "interests of justice so require." 18 U.S.C. § 3006A(a)(2)(B). Here, Petitioner has a strong chance of success on the merits because Petitioner has been held for longer than six months since being ordered removed and Petitioner's country still refuses to accept him or her. However, given the complexity of the law on immigration detention and Petitioner's status as a detained immigrant, Petitioner would have great difficulty presenting the case without the assistance of counsel. For these reasons, Petitioner respectfully requests that the Court appoint counsel.

Date: 12-8-2025

Signature: Jorge Lopez
Petitioner