

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

Nathaniel Sterling, by and through	)	
his next friend, Simone Johnson-Henderson,	)	
	)	
<i>Petitioner,</i>	)	No. 3:25-cv-02122-KAD
	)	
v.	)	
	)	
Pamela J. Bondi, Attorney General of the	)	
United States; Kristi Noem, Secretary	)	
of the Department of Homeland Security;	)	
Todd Lyons, Acting Director, Immigration	)	
and Customs Enforcement; Floyd	)	
Cleveland, Hartford Field Office Assistant	)	
Director, Immigration and Customs	)	
Enforcement	)	December 19, 2025
	)	
<i>Respondents.</i>	)	

**PETITIONER’S EMERGENCY MOTION FOR AN ORDER ENJOINING
RESPONDENTS FROM TRANSFERRING PETITIONER MORE THAN 100 MILES
FROM THIS COURT’S JURISDICTION**

Petitioner Nathaniel Sterling through his next friend, Simone Johnson-Henderson, asks that this Court issue an emergency order enjoining Respondents from transferring him more than 100 miles from this District pending this Court’s adjudication of his habeas corpus petition. Petitioner files this emergency motion because Respondents have engaged in a practice of transferring individuals arrested in the Northeast like him as swiftly as within 12 hours after arrest, to detention facilities as far away as Louisiana and Texas—more than 1,500 miles from this Court.¹

¹ See Second Am. Pet. for Writ of Habeas Corpus and Cmplt. ¶¶ 5, 45-56, *Khalil v. Joyce*, No. 25-cv-01963 (D.N.J. Mar. 19, 2025), ECF 162 (recounting Mr. Khalil’s arrest by ICE the evening of March 8, 2025 and transfer to Louisiana by the afternoon of March 9); First Am. Pet. for Writ of Habeas Corpus and Cmplt. ¶¶ 19-31, *Öztürk v. Trump*, No. 1:25-cv-10695-DJC (D. Mass. Mar. 28, 2025), ECF 12 (describing Ms. Öztürk’s transfer to Louisiana approximately 12 hours after her arrest in Massachusetts); see also Am. Pet. for Writ of Habeas Corpus and Cmplt. ¶¶ 53, 89, *Khan Suri v. Trump*, No. 1:25-cv-00480-PGT-WBP, at, 89 (E.D. Va. Apr. 8, 2025), ECF 34 (detailing Dr. Khan Suri’s transfer from Virginia to Louisiana and then Texas, despite available detention capacity in Virginia).

Petitioner Nathaniel Sterling filed the present petition for habeas corpus after federal officials detained him on December 19, 2025, at or near the Connecticut Superior Court in Manchester. In his habeas petition, Petitioner challenges constitutional and statutory violations. Mr. Sterling now moves this Court under the All Writs Act, 28 U.S.C. § 1651, and Local Rule 7(a)(6) for an emergency order that bars Respondents from transferring him more than 100 miles from this Court's jurisdiction while this petition is pending.

The All Writs Act gives federal courts broad powers to preserve their jurisdiction and the integrity of proceedings before them. *See* 28 U.S.C. § 1651(a) (authorizing courts to “issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law”); *see also United States v. Catoggio*, 698 F.3d 64, 67 (2d Cir. 2012) (noting “courts have significant flexibility in exercising their authority under the Act”).

Petitioner urges the Court to invoke this authority to preserve his access to the counsel of his choosing. *See Innovation Law Lab v. Nielsen*, 310 F. Supp. 3d 1150, 1162 (D. Or. 2018) (prohibiting transfer from the District of Oregon because “detention of aliens far from where potential or existing counsel was located” would “effectively deny access to counsel”); *Orantes-Hernandez v. Thornburgh*, 919 F.2d 549, 566 (9th Cir. 1990) (affirming injunction restricting transfers because they “interfere[d] with established attorney-client relationships”). Transfer also might impair Petitioner's own ability to participate in Court proceedings, including argument and evidentiary proceedings should the Court so order.

Courts regularly grant exactly the relief that Petitioner requests—an injunction prohibiting the government's transfer of a detained noncitizen pending their habeas petition. *See, e.g., Order, Aparicio-Deras v. Turek*, No. 2:25-cv-00726-gwc (D. Vt. Sept. 1, 2025), ECF 2 (prohibiting federal respondents from transferring detainee out of the District of Vermont because it may

“impair Petitioner’s attendance at the court’s habeas hearings and . . . effective consultation with counsel”); Order, *Mahdawi v. Trump*, No. 2:25-cv-00389 (D. Vt. Apr. 14, 2025), ECF 6 (prohibiting federal respondents from deporting or transferring immigrant habeas petitioner out of the District of Vermont pursuant to the Court’s authority under the All Writs Act); Mem. Op. and Order, *Perez-Parra v. Castro*, No. 24-cv-00912 (D.N.M. Feb. 9, 2025), ECF 47 (temporarily restraining transfer of detained immigrant to U.S. military base at Guantanamo Bay, Cuba); Order, *Westley v. Harper*, No. 2:25-cv-00229 (E.D. La. Feb. 2, 2025), ECF 7 (temporarily restraining federal respondents from transferring immigrant habeas petitioner out of the Eastern District of Louisiana); Order, *Campbell v. U.S. Immigr. & Customs Enf’t*, No. 1:20-cv-22999-MGC (S.D. Fl. July 26, 2020), ECF 13 (staying transfer of petitioner from Krome Service Processing Center).

To preserve Petitioner’s access to counsel and thus preserve the integrity of these proceedings, the Court should enjoin transfer more than 100 miles from this District. *Cf.* Order to Show Cause, *Sillah v. Barr*, No. 19-cv-1747 (S.D.N.Y. Feb. 25, 2019), ECF 6 (restraining federal respondents from transferring immigrant habeas petitioner “from the New York City area” pending consideration of habeas petition).

Dated: December 19, 2025

Respectfully submitted,

/s/ Muneer I. Ahmad

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*Motion for law student appearance forthcoming.

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2025, a true copy of the above document was filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record.

/s/ Muneer I. Ahmad
Muneer I. Ahmad

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

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[Proposed] Order

Pursuant to the All Writs Act, 28 U.S.C. § 1651, and Local Rule 7(a)(6), the Court HEREBY ORDERS that Respondents are enjoined from transferring Petitioner more than 100 miles from the jurisdiction of the District of Connecticut.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Presiding