

1 Mandeep S. Rupal (CA Bar # 279664)
2 Manish Soni (CA Bar # 356054)
3 La Firma INMIGRANTES PRIMERO
4 4740 Green River Rd., Ste. 208
5 Corona, CA 92878
6 Telephone: (951) 381 -6500
7 Facsimile: (951) 523-0950
8 mandeepsr@inmigrantesprimero.com

9 Attorney for Petitioner-Plaintiff,
10 Inderjeet Singh

11
12
13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**
15

16 Inderjeet Singh, an individual,
17
18 Petitioner-Plaintiff,

19 v.

20 Patrick DIVVERS, Field Office
21 Director of San Diego Office of U.S.
22 Immigrations and Customs
23 Enforcement; U.S. Department of
24 Homeland Security; Ryan HICKS,
25 Assistant Field Office Director of ICE;
26 Todd M. LYONS, Acting Director,
27 Immigration and Customs
28 Enforcement, U.S. Department of
Homeland Security; Kristi NOEM, in
them Official Capacity, Secretary,
U.S. Department of Homeland
Security; Pam BONDI, in them
Official Capacity, Attorney General of
the United States; and Jeremy
CASEY, Warden, Imperial Regional
Detention Facility; and
ALL PERSONS HAVING CUSTODY
OF THE PETITIONER,

Respondents-Defendants.

Case No.: '25CV3671 JES BLM

**REQUEST FOR JUDICIAL
NOTICE**

(Fed R. Evid. 201)

1 Petitioners respectfully request that the Court take judicial notice of the following
2 matters of public record and government publications, the accuracy of which
3 cannot reasonably be questioned and which are cited in support of the Petition and
4 accompanying motions.
5

6 **Exhibit A: 8 U.S.C. § 1357(a)(2)** – Statutory limits on warrantless immigration
7 arrests. Official source:

8 [https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title8-](https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title8-section1357)
9 [section1357](https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title8-section1357). *Relevance:* ICE lacked authority to arrest Petitioner without a
10 warrant, probable cause, and likelihood of escape.
11

12 **Exhibit B: 8 C.F.R. § 287.8(c)** – Regulatory limits on ICE arrest authority.

13 <https://www.ecfr.gov/current/title-8/section-287.8>. *Relevance:* Confirms ICE
14 violated regulatory arrest standards.
15

16 **Exhibit C: EOIR Automated Case Information System (ACIS)** – Petitioner’s
17 immigration court docket. *Relevance:* Establishes ongoing § 240 proceedings in
18 New York and EOIR jurisdiction.
19

20 **Exhibit D: Government Accountability Office – Immigration Detention**

21 **Costs:** <https://www.gao.gov/products/gao-21-149> *Relevance:* Demonstrates
22 public burden of unlawful detention. Judicial notice is appropriate under Fed. R.
23 Evid. 201(b)(2).
24
25
26
27
28

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

VERIFICATION PURSUANT TO 28 U.S.C. 2242

I am submitting this verification on behalf of the Petitioners because I am one of Petitioners’ attorneys. I have discussed with the Petitioner the events described in the Petition.