


1 **ABDULAZIZ SAID ABDELLA**  
2 **ALIEN NO:**   
3 **FLORENCE CORRECTIONAL COMPLEX**  
4 **P.O BOX 6300**  
5 **FLORENCE, AZ 85132**

6 **PRO SE**

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DEC 19 2025	
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF ARIZONA**

9 Abdulaziz Said Abdella,

10  
11 **Petitioner,**

12 **Vs.**

13  
14 Luis Rosa Jr, Warden, Central Arizona Florence  
15 Correctional Complex;  
16 John Cantu, Director, ICE Enforcement and Removal  
17 Operations, Phoenix Field Office;  
18 K. Bourne, Deportation Officer, United States  
19 Immigration and Custom Enforcement, Florence,  
20 Arizona;  
21 ICE Field Office, Phoenix, Arizona;  
22 Todd M. Lyons, Acting Director, United States  
23 Immigration and Customs Enforcement;  
24 Kristi Noem, Secretary, U.S. Department of  
25 Homeland Security;  
26 Pamela Bondi, Attorney General, U.S. Department of  
27 Justice; and The U.S. Attorney for the District of  
28 Arizona,.

**Respondents.**

**CV25-04798-PHX-DJH-JFM**

**Case No.**



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

**DETAINED**

Petitioner Abdulaziz Said Abdella, ("Mr Abdella" or "Petitioner"), has filed a petition for writ of habeas corpus under 28 U.S.C. § 2241 challenging Petitioner's indefinite detention by Respondents.

1 Petitioner hereby respectfully requests that the court appoint counsel to represent him in this matter.

2 Petitioner was taken into custody by Immigration and Customs Enforcement (ICE) on May 16<sup>th</sup>,  
3 2025. Petitioner has remained in ICE custody since that date. An Immigration Judge ordered Petitioner  
4 removed on September 8<sup>th</sup>, 2025 and Petitioner's removal order became final on the same day, but ICE  
5 has been unable to remove Petitioner.  
6

7 In *Zadvydus v. Davis*, the Supreme Court held that the Immigration statute 8 U.S.C. § 1231(a)(6)  
8 does not allow ICE to detain a noncitizen indefinitely while attempting to carry out removal. 533 U.S.  
9 678, 689 (2001). if the noncitizen provides good reason to believe that removal is not reasonably  
10 foreseeable, the burden shifts to the government to rebut that showing. *Id.* at 701.  
11

12 This court has the authority to appoint counsel to assist an indigent Petitioner if the interests of  
13 justice so require. In fact, the courts generally have endorsed the appointment of counsel to represent  
14 indigent and legally unsophisticated prisoners in the following types of non-capital cases:  
15

- 16 (1) Cases that turn on substantial and complex procedural, legal or mixed legal and factual  
17 questions.
- 18 (2) Cases involving uneducated or mentally or physically impaired petitioners.
- 19 (3) Cases likely to require the assistance of experts either in framing or in trying the claims.
- 20 (4) Cases in which the indigent is in no position to investigate crucial facts.
- 21 (5) Factually complex cases, e.g., ones involving "conflicting testimony," in which the truth is  
22 more likely to "be exposed where both sides are represented by those trained in the  
23 presentation of evidence."  
24  
25

26 In the present case, Petitioner has been in Immigration custody since May 16<sup>th</sup>, 2025.  
27 He does not have the financial resources to retain counsel. *See Application to Proceed In Forma*  
28

1 *Pauperis*. Petitioner also believes that he has a strong chance of success on the merits.

2           However, given the complexity of the law on Immigration detention and Petitioner's status as a  
3 detained Immigrant, he would have great difficulty presenting the case without the assistance of counsel.  
4 The aid of an attorney is especially important in this case, given petitioner's lack of familiarity with the  
5 legal procedures involved in requesting and obtaining discovery and because of the complexity involved  
6 in accessing documents and evidence while detained, when resources at the detention center are limited  
7 and the time available to find necessary help is restricted as well.  
8

- 9
- 10       • Petitioner has no special education in this area of the law and has only had a few years of
  - 11       schooling.
  - 12       • Petitioner has a very limited knowledge of English.
  - 13       • Petitioner has no knowledge of the U.S. legal system and does not understand some of the
  - 14       issues in this case.
  - 15       • Immigration custody and physical deportation protocols, and other issues involved here, are
  - 16       complex and petitioner is unable to adequately represent himself.
  - 17       • The issues presented in the Petitioner's case are complex, and the Petitioner's fundamental
  - 18       right to freedom is at stake.
  - 19       • Petitioner has limited access to experts and investigators to check or prove factual allegations
  - 20       due to lack of financial resources.
  - 21       • Petitioner is detained with limited access to Petitioner's family, friends or anyone to help with
  - 22       the investigation.
  - 23       • Petitioner is detained with limited access to documents or information about the situation in
  - 24       his home country and feasibility of the physical removal.
  - 25
  - 26
  - 27
  - 28



**CERTIFICATE OF SERVICE**

PLEASE TAKE NOTICE that on December 13, 2025, Petitioner filed with the United States District Court for the District of Arizona, this motion for appointment of counsel. I, **ABDULAZIZ SAID ABDELLA, Pro Se**, do hereby state that I caused a copy of this motion for appointment of counsel to be served upon the listed individuals below at the indicated addresses via certified U.S. mail.

**TO:** Luis Rosa Jr, Warden  
Central Arizona Florence Correctional  
Complex  
1155 North Pinal Pkwy,  
Florence, AZ 85132

John Cantu, Director  
ICE Enforcement and Removal Operations,  
Phoenix Field Office  
2035 N. Central Ave,  
Phoenix, AZ 85004

Todd Lyons, Acting Director  
U.S. Immigration and Customs  
Enforcement  
500 12th St. SW  
Washington, DC 20536

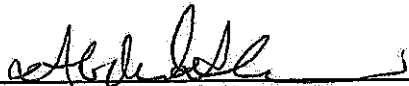
Kristi Noem, Secretary  
U.S. Department of Homeland Security  
2707 Martin Luther King Jr. Ave. SE  
Washington, DC 20528

Pamela Bondi, Attorney General  
U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530-0001

United States Attorney  
United States Attorney's Office  
District of Arizona  
Two Renaissance Square  
40 N. Central Ave., Suite 1800  
Phoenix, AZ 85004-4449

K. Bourne, Deportation Officer  
United States Immigration and  
Custom Enforcement  
3250 N. Pinal Parkway Avenue,  
Florence, AZ 85132

ICE Field Office  
2035 N. Central Avenue,  
Phoenix, AZ 85004

Signed by:   
Abdulaziz Said Abdella  
**Petitioner, Pro Se.**