

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

XIAOLIN ZHENG,

Petitioner,

v.

JOHN TSOUKARIS, *et al.*,

Respondents.

HON. CLAIRE C. CECCHI, U.S.D.J.

Civil Action No. 25-18235 (CCC)

CONSENT MOTION TO TRANSFER VENUE

Petitioner Xiaolin Zheng and Respondents John Tsoukaris, Kristi Noem, and Pamela Bondi (collectively, “the Parties”) respectfully move this Court for an order transferring the above-captioned action from the District of New Jersey to the District of Arizona, pursuant to 28 U.S.C. § 1404. In support of this motion, the Parties state as follows:

1. Petitioner filed the instant action on December 5, 2025, in the District of New Jersey.
2. On December 17, 2025, Counsel for Respondents informed Petitioner’s counsel that Petitioner was transferred from a facility in New York to Florence Service Processing Center in Florence, AZ on December 4, 2025, prior to the filing of the petition.
3. Counsel for the Respondents further informed Petitioner’s counsel that Petitioner was never detained in New Jersey.

4. Habeas cases arising under 28 U.S.C. § 2241, like this one, may generally be brought only in the district of confinement. *See, e.g., Anariba v. Dir. Hudson Cnty. Corr. Ctr.*, 17 F.4th 434, 441 (3d Cir. 2021).
5. The Parties therefore agree that the appropriate venue for this habeas action is the District of Arizona based on the location of Petitioner at the time of filing.
6. The Parties have conferred and mutually consent to the transfer of this case to the District of Arizona.
7. For the reasons stated above, the Parties respectfully request that the Court grant this motion and issue an order transferring this case from the District of New Jersey to the District of Arizona, where it may be properly adjudicated.
8. The Parties affirm that this transfer will not unfairly prejudice any party or cause undue delay in the resolution of this case. Additionally, the Parties assert that this motion is not made for any improper purpose or to achieve any unfair advantage. The intent behind this transfer is solely to facilitate the efficient administration of justice.

WHEREFORE, the Parties respectfully request that the Court grant this Consent Motion to Transfer Venue and enter an order transferring the above-captioned case to the United States District Court for the District of Arizona.

Date: December 18, 2025

Respectfully Submitted,

TODD BLANCHE
U.S. Deputy Attorney General

JORDAN FOX
Chief of Staff & Associate Deputy
Attorney General
Special Attorney

By: */s Andrew Boccio*
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Attorneys for Petitioner

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[PROPOSED] ORDER

Upon consideration of the Consent Motion to Transfer Venue to the District of Arizona it is hereby **ORDERED** that the Consent Motion is **GRANTED** and this action is **TRANSFERRED** the District of Arizona.

Dated: _____

HON. CLAIRE C. CECCHI, U.S.D.J.
UNITED STATES DISTRICT JUDGE