

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION

Ruslan Kalinin,	)	
	)	
Petitioner,	)	Case No. 5:26-CV-00005-LGW-BWC
	)	
v.	)	
	)	
WARDEN OF FOLKSTON ICE	)	APPLICATION FOR ISSUANCE OF
PROCESSING CENTER, in their official	)	ORDER TO SHOW CAUSE
capacity; KRISTEN SULLIVAN, in her	)	
official capacity as Acting Field Office	)	
Director of the Immigration and Customs	)	
Enforcement, Enforcement and Removal	)	
Operations Atlanta Field Office; KRISTI	)	
NOEM, in her official capacity as Secretary of	)	
the Department of Homeland Security; and	)	
PAMELA BONDI, in her official capacity as	)	
Attorney General of the United States,	)	
	)	
Respondents.	)	
	)	

Pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests that this Court “forthwith” issue an order directing Respondents to show cause why the petition for a writ of habeas corpus filed by Petitioner pursuant to 28 U.S.C. § 2241 should not be granted.

2. Petitioner challenges his unlawful and unreasonable detention in the custody of Immigration and Customs Enforcement (“ICS”) at Folkston ICE Processing Center. *See* Petition for Writ of Habeas Corpus, Dkt. No. 1.

3. The federal habeas corpus statute provides that “[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” 28 U.S.C. § 2243.

4. Section 2243 further provides that the writ or order to show cause “shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed.”

5. Section 2243 further provides that the court shall hold a hearing on the writ or order to show cause “not more than five days after the return unless for good cause additional time is allowed.”

6. In addition, Section 2243 states that the court “shall summarily hear and determine the facts, and dispose of the matter as law and justice require.”

7. Pursuant to Section 2243, Petitioner requests that the Court immediately issue an Order to Show Cause directing Respondents to file a return within three days of the Court’s order, showing cause, if any, why the writ of habeas corpus should not be granted, and to provide Petitioner an opportunity to file a reply within 5 days after Respondents file the return.

8. Giving Respondents additional time to respond is inappropriate in this case because Petitioner faces irreparable harm as he has unreasonably been in ICE’s physical detention (including his current detention at the Folkston ICE Processing Center) or effective detention (required ICE check-ins and other requirements of the Order of Supervision (OSIP)) for over 5 years and is not a flight risk nor a danger to the community.

Dated January 9, 2026.

Respectfully submitted,

/s/ Joseph H. Huff

Joseph H. Huff

Georgia Bar No. 374935

KILPATRICK TOWNSEND

& STOCKTON LLP

Enterprise Mill

1450 Greene Street, Suite 230

Augusta, GA 30901

Phone: (706) 823-4202

Email: jhuff@ktslaw.com

Theodore G. Brown, III

California Bar No. 114672

(Admitted Pro Hac Vice)

KILPATRICK TOWNSEND

& STOCKTON LLP

1302 El Camino Real, Suite 175

Menlo Park, CA 94025

Tel: (650) 324-6353

Email: tbrown@ktslaw.com

Counsel for Petitioner

CERTIFICATE OF SERVICE

This is to certify that on January 9, 2026, I electronically filed the foregoing *Application for Issuance of Order to Show Cause* with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record, and served a copy of the foregoing via Certified Mail, Return Receipt Requested to the following:

Warden of Folkston ICE
Processing Center
3026 Hwy 252 E.
Folkston, GA 31537

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

Margaret Heap
United States Attorney
Southern District of GA
Department of Justice
22 Barnard Street, Suite 300
Savannah, GA 31401

Secretary Kristi Noem
Department of Homeland Security
Washington, DC 20528

Kristen Sullivan
Acting Field Office Director
U.S. Immigration and Customs Enforcement
Enforcement and Removal Operations
c/o Atlanta Field Office
180 Ted Turner Drive SW, Suite 522
Atlanta, GA 30303

KILPATRICK TOWNSEND
& STOCKTON LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, GA 30901
Phone: (706) 823-4202
Email: jhuff@ktslaw.com

/s/ Joseph H. Huff

Joseph H. Huff
Georgia Bar No. 374935

Counsel for Petitioner