

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

RECEIVED
 ENTERED _____ SERVED ON _____
 COUNSEL PARTIES OF RECORD

JAN 23 2026

CLERK US DISTRICT COURT
 DISTRICT OF NEVADA

BY: RTD DEPUTY

UNITED STATES DISTRICT COURT

for the

Liu, Zeng Yan
Petitioner

v.


John Mattos
Respondent

(name of warden or authorized person having custody of petitioner)

Case No. 2:26-cv-00161-APG-EJY
(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

- (a) Your full name: Liu Zeng Yan
 (b) Other names you have used: _____
- Place of confinement:
 (a) Name of institution: Nevada Southern Detention Center
 (b) Address: 2190 E. Mesquite Ave. F3 - 15B
Pahrump, N.V. 89060
 (c) Your identification number: A# 
- Are you currently being held on orders by:
 Federal authorities State authorities Other - explain: _____
- Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
 If you are currently serving a sentence, provide:
 (a) Name and location of court that sentenced you: _____
 (b) Docket number of criminal case: _____
 (c) Date of sentencing: _____
 Being held on an immigration charge
 Other (explain): 8 USC 1251 - Deportation

Decision or Action You Are Challenging

- What are you challenging in this petition:
 How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (explain): Prolong Detention

6. Provide more information about the decision or action you are challenging:

- (a) Name and location of the agency or court: N/A
- (b) Docket number, case number, or opinion number: N/A
- (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):
N/A
- (d) Date of the decision or action: N/A

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

- Yes
- No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: Board of Immigration Appeal
- (2) Date of filing: 10/14/2005
- (3) Docket number, case number, or opinion number: _____
- (4) Result: _____
- (5) Date of result: 09/20/2007
- (6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal: _____

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

- Yes
- No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

N/A

(b) If you answered "No," explain why you did not file a second appeal: _____

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

N/A

(b) If you answered "No," explain why you did not file a third appeal: _____

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

- (1) Name of court: N/A
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

Yes No

If "Yes," provide:

- (1) Name of court: N/A
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: N/A

11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

Yes No

If "Yes," provide:

- (a) Date you were taken into immigration custody: 10/16/2025
- (b) Date of the removal or reinstatement order: _____
- (c) Did you file an appeal with the Board of Immigration Appeals?
 Yes No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

(1) Date of filing: N/A

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

(d) Did you appeal the decision to the United States Court of Appeals?

Yes No

If "Yes," provide:

(1) Name of court: N/A

(2) Date of filing: _____

(3) Case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

Yes No

If "Yes," provide:

(a) Kind of petition, motion, or application: N/A

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Grounds for Your Challenge in This Petition

- 13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: Long Detention/Violation of My Constitution Rights. § USC 1231(a)(1)(A). See Zadvydas v. Davis 533 US 678, 702 (2001) Prieto-Romero v. Clark 534 F.3d 1053, 1059 (9th Cir 2008) Banda v. Mcatenani (a) Supporting facts (Be brief. Do not cite cases or law.): 385 F. Supp. 2d 1099, 1112 (W.D. Was

Long Detention Over 3 months 2019)

(b) Did you present Ground One in all appeals that were available to you?
 Yes No

GROUND TWO: I'm Challenging My Detention. There is no Forseeable Future Deportation

(a) Supporting facts (Be brief. Do not cite cases or law.):

Violation of my Constitutional Rights

(b) Did you present Ground Two in all appeals that were available to you?
 Yes No

GROUND THREE: My health Worsening in detention because of My age

(a) Supporting facts (Be brief. Do not cite cases or law.):

See Medical Records

(b) Did you present Ground Three in all appeals that were available to you?
 Yes No

§ USC 1231 (a) (1) (A) Governs The Detention And Release Of Non-Citizens Who Have Been Ordered Removed. The Removal Period Generally Lasts 90 ~~Days~~ Days And It Begins On The Latest Of The Following: (1) The Date The Order Of Removal Becomes Final. . . . After The Removal Period Expires, DHS Has Discretionary Authority To Continue To Detain Or Release

Supervision

The Person On ~~Supervision~~ § 1231 (a) (b). However, The Supreme Court Determined That It's Reasonable To Detain The Person For Six Months, But, Often This 6-months Period, The Government Must Show Evidence That Removal Is Significantly Likely To Occur In The Near Future, If The Government Fails, The Person Is Entitled To Habeas Relief See *Zadvydas v. Davis*, 533 US 678 702 (2001); *Prieto-Romero v. Clark* 534 F.3d 1053, 1059 (9th Cir 2008); *Banda v. McAleenan*, 385 F. Supp. 2d 1099, 1112 (W. D. Was 2019)

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

GROUND FOUR: I have been living and working in the U.S.A. since about 01/05/2005

(a) Supporting facts (Be brief. Do not cite cases or law.):

Family ties

(b) Did you present Ground Four in all appeals that were available to you?

Yes

No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

15. State exactly what you want the court to do: Release me immediately

or Bond hearing

Release UNDER Habeas CORPUS ASAP,

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date:

1/13/2026



Signature of Petitioner

Pro/se

Signature of Attorney or other authorized person, if any