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**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

Ousmane CAMARA,



Petitioner,

v.

Craig LOWE, in his official capacity as
Warden, Pike County Correctional
Facility; Kristi NOEM, in her official
capacity as Secretary, U.S. Department
of Homeland Security; U.S.
DEPARTMENT OF HOMELAND
SECURITY; and Pamela BONDI, U.S.
Attorney General,

Respondents.

Case No. 3:26-CV-00292

**APPLICATION OF ISSUANCE
FOR ORDER TO SHOW CAUSE**

1. 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 further requests that this Court enter an order enjoining the Respondents from transferring the Petitioner outside of the jurisdiction of this District and enjoining the Respondents from removing Petitioner from the United States during the pending of these proceedings.

3. Petitioner challenges his immigration detention under INA Section 1225(b)(2)(A) *See* Petition for Writ of Habeas Corpus, Dkt. No. 1.

4. 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.

5. 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.”

6. 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.”

7. 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.”

8. Pursuant to Section 2243, Petitioner requests that the Court immediately issue an Order to Show Cause directing Respondents to file a return within three (3) 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 seven (7) days after Respondents file the return.

9. Giving Respondents additional time to respond is inappropriate in this case because Petitioner faces irreparable harm due to the ongoing deprivation, by Respondents, of his Constitutional right to due process and his protected liberty interests.

DATED this 3rd of February, 2026.

/s/ Stanley J. Ellenberg, Esq.
Stanley J. Ellenberg, Esquire.

Attorney for Petitioner