

1 Gurpreet Kaur, Esq.
2 Kaur Legal Group, PC
3 674 County Square Dr, Suite 305
4 Ventura, CA 93003
5 Ph. 805-300-9003; Cell 909-997-4570
6 Fax: 805-716-6100
7 E-mail: gurpreetkauresq@gmail.com
8 *Attorney for Petitioner*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

PARVINDER SINGH

Petitioner,

v.

JUAN BALTASAR, Warden of the Denver
Contract Detention Facility; TODD LYONS,
Acting Director of Immigration and Customs
Enforcement; KRISTI NOEM, Secretary of the
U.S. Department of Homeland Security; PAMELA
BONDI, Attorney General of the United States

Respondents.

Civil Action No.

**VERIFIED PETITION FOR
HABEAS CORPUS**

INTRODUCTION

1. Petitioner Singh is unlawfully detained by Respondents and denied access to a bond hearing. Petitioner was born in India and entered the United States without inspection on April 17, 2023. DHS briefly detained Petitioner pursuant to a Form I-200 warrant and subsequently released him on his own recognizance. As a condition of release, DHS enrolled Petitioner in the Alternatives to Detention (“ATD”) program and required regular check-ins with Immigration and Customs Enforcement (“ICE”). Petitioner complied perfectly with all conditions of release and has never been cited for any violation.

1 2. On April 18, 2023, DHS served Petitioner with a Notice to Appear (“NTA”), charging
2 him solely under INA § 212(a)(6)(A)(i) as a noncitizen present without admission or parole. That
3 remains the only charge in his removal proceedings. Petitioner has no criminal history whatsoever and
4 has remained in full compliance with all immigration requirements.

5 3. Despite more than two years of flawless compliance and liberty under government
6 supervision, Petitioner was abruptly re-detained on December 23, 2025. On that date, Petitioner was
7 lawfully driving when he was pulled over by a county sheriff. He had not committed any traffic
8 violation, and no citation was issued. Instead, the sheriff contacted ICE, and Petitioner was taken into
9 custody solely because he requested to check his immigration status. At no time was Petitioner
10 informed of any violation of his release conditions, any new charge, or any individualized basis for
11 detention.
12

13 4. Petitioner is in pre-final order removal proceedings and is properly detained, if at all,
14 under 8 U.S.C. § 1226(a), which provides for discretionary detention and requires access to an
15 individualized bond hearing before an Immigration Judge. However, DHS has attempted to reclassify
16 Petitioner as subject to mandatory detention under 8 U.S.C. § 1225(b), relying on its July 8, 2025
17 Interim Guidance and the Board of Immigration Appeals’ decision in *Matter of Yajure Hurtado* (Sept.
18 5, 2025).
19

20 5. DHS’s reclassification is unlawful. Courts have repeatedly rejected the Government’s
21 attempt to convert individuals long released into mandatory detainees under § 1225(b). Individuals like
22 Petitioner—who were arrested pursuant to a Form I-200, served with an NTA, and released into
23 removal proceedings—are governed by § 1226(a), not § 1225(b).
24

25 6. Because Petitioner is detained under § 1226(a), continued detention without access to a
26 bond hearing violates the Immigration and Nationality Act and the Due Process Clause. Petitioner
27
28

1 therefore seeks habeas relief ordering Respondents to provide him with an immediate bond hearing or
2 release him pending completion of his removal proceedings.

3 **JURISDICTION**

4 7. This action arises under the Constitution of the United States and the INA, 8 U.S.C.
5 § 1101 *et seq.*

6 8. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28
7 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension
8 Clause).

9 9. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*,
10 the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.
11

12 **VENUE**

13 10. Venue is proper because Petitioner is detained in Denver Contract Detention Facility,
14 which is within the jurisdiction of this District. Venue is also proper in this District because
15 Respondents are officers, employees, or agencies of the United States. *See* 28 U.S.C. § 1391(e).
16

17 **PARTIES**

18 11. Respondent Juan Baltasar is sued in his official capacity as Warden of the Denver
19 Contract Detention Facility. Respondent Baltasar is the physical custodian of Petitioner.
20

21 12. Respondent Todd Lyons is sued in his official capacity as the Acting Director of U.S.
22 Immigration and Customs Enforcement. Respondent Lyons is a legal custodian of Petitioner and has
23 authority to release him.
24

25 13. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S.
26 Department of Homeland Security. In this capacity, Respondent Noem is responsible for the
27 implementation and enforcement of the INA, and oversees ICE, the component agency responsible for
28

1 Petitioner's detention and custody. Respondent Noem is a legal custodian of Petitioner.

2 14. Respondent Pamela Bondi is sued in her official capacity as the Attorney General of the
3 United States and the senior official of the U.S. Department of Justice. In that capacity, she has the
4 authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review
5 ("EOIR"), which administers the immigration courts and the BIA. Respondent Bondi is a legal
6 custodian of Petitioner.
7

8 **STATEMENT OF FACTS**

9 15. Petitioner Singh was born in India and entered the United States without inspection on
10 April 17, 2023. DHS briefly detained him pursuant to a Form I-200 warrant for arrest. After processing,
11 DHS released Petitioner on his own recognizance.
12

13 16. As a condition of release, Petitioner was enrolled in the Alternatives to Detention
14 ("ATD") program and required to report regularly to ICE. On April 18, 2023, DHS served Petitioner
15 with a Notice to Appear charging him solely under INA § 212(a)(6)(A)(i). No other grounds of
16 removability have ever been alleged.
17

18 17. Petitioner has fully complied with every condition imposed upon him. He has attended
19 all required ICE check-ins, complied with ATD monitoring without a single violation, maintained
20 updated contact information, and appeared as directed in his removal proceedings. ICE has never issued
21 any warning, violation notice, or allegation of noncompliance.
22

23 18. Petitioner has no criminal history. He has never been arrested, charged, or convicted of
24 any offense. At no point prior to December 23, 2025 did ICE allege that Petitioner posed a danger to
25 the community or a flight risk.

26 19. On December 23, 2025, Petitioner was lawfully operating a motor vehicle when he was
27 stopped by a county sheriff. Petitioner had not committed any traffic infraction, equipment violation,
28

1 or moving violation. No citation was issued. Instead, the sheriff contacted ICE, and Petitioner was
2 detained solely because he requested to check his immigration status. He was then transferred into ICE
3 custody.

4 20. Petitioner was not informed of any violation of his ATD conditions, any failure to
5 appear, any new charge, or any changed circumstance. He was told only that he had “a case pending
6 before immigration court.”
7

8 21. Petitioner’s re-detention occurred more than two years after DHS had affirmatively
9 determined that he could remain at liberty during removal proceedings. ICE provided no individualized
10 custody determination, no explanation of changed circumstances, and no opportunity for bond prior to
11 detention.
12

13 22. Petitioner’s detention was not based on any conduct by Petitioner, but rather on DHS’s
14 categorical policy decision to reclassify certain noncitizens as subject to mandatory detention under §
15 1225(b). This policy-driven re-detention—executed without violation, without individualized findings,
16 and without changed circumstances—deprived Petitioner of liberty without due process.
17

18 23. Petitioner reasonably relied on DHS’s repeated determination that he could remain at
19 liberty while his removal proceedings were pending. He structured his life around that liberty and
20 complied fully with every government requirement. The Government may not revoke that liberty
21 arbitrarily or without individualized justification.
22

23 24. Petitioner therefore remains unlawfully detained and is entitled to immediate habeas
24 relief in the form of a bond hearing or release pending the completion of his removal proceedings.
25

26 STATUTORY FRAMEWORK

27 25. The INA prescribes three basic forms of detention for noncitizens in removal
28 proceedings. First, 8 U.S.C. § 1226(a) authorizes the detention of noncitizens in standard non-expedited

1 removal proceedings before an IJ. *See* 8 U.S.C. § 1226(a); 8 U.S.C. § 1229a. Individuals in section
2 1226(a) detention are entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§
3 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain
4 crimes are subject to mandatory detention, *see* 8 U.S.C. § 1226(c).

5 26. Second, the INA provides for mandatory detention of noncitizens subject to expedited
6 removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referred to under
7 8 U.S.C. § 1225(b)(2).

9 27. Finally, the INA also provides for detention of noncitizens who are subject to final
10 orders of removal, including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).
11 The detention provisions at section 1226(a) and 1225(b)(2) were enacted as part of the Illegal
12 Immigration Reform and Immigrant Responsibility Act (“IIRIRA”) of 1996, Pub. L. No. 104-208, Div.
13 C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226(c) was most
14 recently amended earlier this year by the Laken Riley Act (“LRA”), Pub. L. No. 119-1, 139 Stat. 3
15 (2025).
16

17 28. Following enactment of the IIRIRA, the EOIR drafted new regulations explaining that,
18 in general, people who entered the country without inspection were not considered detained under
19 section 1225 and that they were instead detained under section 1226(a). *See* Inspection and Expedited
20 Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum
21 Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997). In the decades that followed, most noncitizens
22 who entered without inspection—unless they were subject to some other detention authority—received
23 bond hearings. This practice was also consistent with the practice prior to the enactment of the IIRIRA,
24 in which noncitizens who were not deemed “arriving” were entitled to a custody hearing before an IJ
25 or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229
26
27
28

1 (1996) (noting that section 1226(a) simply “restates” the detention authority previously found at section
2 1252(a)).

3 29. On July 8, 2025, DHS issued a memo to all employees of ICE stating that “[t]his
4 message serves as notice that DHS, in coordination with the Department of Justice (DOJ), has revisited
5 its legal position on detention and release authorities. DHS has determined that section 235 of the
6 Immigration and Nationality Act (INA) [8 U.S.C. § 1225], rather than section 236 [8 U.S.C. § 1226],
7 is the applicable immigration detention authority for all applicants for admission. The following interim
8 guidance is intended to ensure immediate and consistent application of the Department’s legal
9 interpretation while additional operational guidance is developed.” The memo further stated DHS’ new
10 position with regard to custody determinations as follows:
11
12

13 An “applicant for admission” is an alien present in the United States who has not been admitted
14 or who arrives in the United States, whether or not at a designated port of arrival. INA §
15 235(a)(1) [8 U.S.C. § 1225(a)(1)]. **Effective immediately, it is the position of DHS that such**
16 **aliens are subject to detention under INA § 235(b) [8 U.S.C. § 1225(b)] and may not be**
17 **released from ICE custody except by INA § 212(d)(5) parole.** These aliens are also ineligible
18 for a custody redetermination hearing (“bond hearing”) before an immigration judge and may
19 not be released for the duration of their removal proceedings absent a parole by DHS. For
20 custody purposes, these aliens are now treated in the same manner that “arriving aliens” have
21 historically been treated. **The only aliens eligible for a custody determination and release**
22 **on recognizance, bond, or other conditions under INA § 236(a) [8 U.S.C. § 1226(a)] during**
23 **removal proceedings are aliens admitted to the United States and chargeable with**
24 **deportability under INA § 237, with the exception of those subject to mandatory detention**
25 **under INA § 236(c) [8 U.S.C. § 1226(c)].**

26 Moving forward, ICE will not issue Form I-286, Notice of Custody Determination, to applicants
27 for admission because Form I-286 applies by its terms only to custody determinations under
28 INA § 236 and part 236 of Title 8 of the Code of Federal Regulations. With a limited exception
for certain habeas petitioners, on which the Office of the Principal Legal Advisor (OPLA) will
individually advise, if Enforcement and Removal Operations (ERO) previously conducted a
custody determination for an applicant for admission still detained in ICE custody, ERO will
affirmatively cancel the Form I-286.

29 *See* [https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-](https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission)
30 [applications-for-admission](https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission) (last accessed October 18, 2025) (emphasis original).

31 30. As a result, DHS now considers all noncitizens who have entered the United States

1 without inspection and are subject to the grounds of inadmissibility, including long-time U.S. residents,
2 to be subject to mandatory detention under section 1225(b) and ineligible for release on bond.
3 Conversely, according to DHS “[t]he only aliens eligible for a custody determination and release on
4 recognizance, bond, or other conditions under INA § 236(a) [8 U.S.C. § 1226(a)] during removal
5 proceedings are aliens admitted to the United States and chargeable with deportability under INA §
6 237, with the exception of those subject to mandatory detention under INA § 236(c) [8 U.S.C. §
7 1226(c)].” *Id.*

9 31. On September 5, 2025, the BIA issued a decision in *Matter of Yajure Hurtado*, 29 I&N
10 Dec. 216 (BIA 2025) holding that, based on the plain language of section 1225(b)(2)(A), IJs lack
11 authority to hear bond requests or to grant bond to aliens who are present in the United States without
12 admission.

13
14 32. Subsequent federal court authority has rejected DHS’s interpretation and confirmed that
15 individuals in Petitioner’s position remain eligible for bond under § 1226(a). In *Bautista–Maldonado*
16 v. DHS, the district court held that DHS may not reclassify noncitizens who are already placed in
17 removal proceedings and detained pre-final order as subject to mandatory detention under § 1225(b).
18 The court concluded that such detention contravenes the statutory scheme and unlawfully deprives
19 noncitizens of their right to a bond hearing. Under *Bautista–Maldonado*, noncitizens like Petitioner—
20 who are in removal proceedings and lack a final order of removal—are properly detained, if at all,
21 pursuant to § 1226(a) and must be afforded an individualized bond hearing before an IJ. Accordingly,
22 Petitioner’s continued detention without access to bond violates the INA and the Due Process Clause,
23 and Petitioner is statutorily and constitutionally eligible for release on bond pending the resolution of
24 his removal proceedings.
25
26

27 **CLAIMS FOR RELIEF**
28

COUNT ONE

Violation of Fifth Amendment Right to Substantive Due Process

33. The allegations in the above paragraphs are realleged and incorporated herein.

34. Petitioner is challenging DHS' unlawful custody determination that Petitioner is subject to detention under 8 U.S.C. § 1225(b) and is ineligible for bond and his continued detention under the automatic stay provision at 8 C.F.R. § 1003.19(i)(2), which violates Petitioner's right to substantive due process of law afforded him through the Fifth Amendment to the United States Constitution.

35. The Fifth Amendment provides in pertinent part: "No person shall be . . . deprived of life, liberty, or property, without due process of law[.]" U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

36. Petitioner was arrested pursuant to a Form I-200, served with a Notice to Appear on April 18, 2023, and placed in removal proceedings. DHS made an affirmative custody determination to release him under § 1226(a) subject to ATD monitoring and reporting requirements. Petitioner complied perfectly with all conditions of release for more than two years.

37. Petitioner was re-detained on December 23, 2025, without any allegation of violation, without changed circumstances, and without an individualized determination that he posed a danger or flight risk. Respondents have attempted to retroactively reclassify Petitioner as subject to § 1225(b) mandatory detention in order to deny him access to bond.

38. Once DHS exercised discretionary custody authority under § 1226(a) and released Petitioner, it could not arbitrarily revoke his physical liberty absent changed circumstances, violation of conditions, or a constitutionally adequate individualized determination. The categorical re-detention of a compliant noncitizen based solely on a policy shift constitutes arbitrary governmental action.

1 39. Respondents' continued detention of Petitioner without access to bond under § 1226(a)
2 is excessive in relation to any legitimate governmental purpose and therefore violates the Fifth
3 Amendment's guarantee of substantive due process.

4 40. As a remedy, this Court should declare that Petitioner is detained under § 1226(a), order
5 Respondents to provide an immediate constitutionally adequate bond hearing before an Immigration
6 Judge, or in the alternative order Petitioner's immediate release
7

8 **COUNT TWO**

9 **Violation of Petitioner's Procedural Due Process Rights**

10 41. The allegations in the above paragraphs are realleged and incorporated herein.

11 42. The Fifth Amendment prohibits the Government from depriving a person of liberty
12 without constitutionally adequate procedures.
13

14 43. In *Mathews v. Eldridge*, the U.S. Supreme Court set forth the factors to consider in
15 determining if government action deprives an individual's Fifth Amendment right to procedural due
16 process or whether the government process is constitutionally adequate. 424 U.S. 319 (1976) The
17 *Mathews* factors are as follows: First, the private interest that will be affected by the official action;
18 [S]econd, the risk of an erroneous deprivation of such interest through the procedures used, and the
19 probable value, if any, of additional or substitute procedural safeguards; [Third], the Government's
20 interest, including the function involved and the fiscal and administrative burdens that the additional
21 or substitute procedural requirement would entail. *Id.* at 335.
22

23 44. As to the private interest factor, it is the "most elemental of liberty interests." *Hamdi v.*
24 *Rumsfeld*, 542 U.S. 507, 529 (2004). Petitioner has perhaps the most acute private interest known to
25 personkind short of life itself: bodily freedom.
26

27 45. With respect to the second factor, erroneous deprivation of Petitioner's liberty is at risk.
28

1 Petitioner is not subject to detention under 8 U.S.C. § 1225(b) as DHS claims. As to the third factor,
2 there is no significant governmental interest in continuing to hold Petitioner in custody, particularly
3 because an IJ has already found that Petitioner has satisfied his burden that he is not a danger to the
4 community or risk of flight when it released him on ROR, and he has no criminal history or violations
5 of the conditions of his release.

6
7 46. The risk of erroneous deprivation is extraordinarily high. Respondents re-detained
8 Petitioner without notice, without a hearing, without any finding of danger or flight risk, and without
9 any allegation that he violated the conditions of his release. Petitioner was denied the opportunity to
10 challenge his custody classification before a neutral decisionmaker.

11
12 47. Additional procedural safeguards—specifically, a prompt individualized bond hearing
13 before an Immigration Judge at which the Government bears the burden of justifying continued
14 detention—would significantly reduce the risk of erroneous deprivation.

15
16 48. The Government’s interest in detaining Petitioner without a hearing is minimal.
17 Petitioner has no criminal history, has never violated ATD conditions, and fully complied with all
18 reporting requirements for more than two years. There is no legitimate governmental interest in
19 categorical re-detention without individualized process.

20
21 49. By revoking Petitioner’s liberty without notice and without providing a constitutionally
22 adequate bond hearing, Respondents have violated Petitioner’s right to procedural due process under
23 the Fifth Amendment.

24
25 50. Petitioner is therefore entitled to an order requiring a prompt, constitutionally adequate
26 bond hearing, or release from detention.

27
28
COUNT THREE

Violation of the Immigration and Nationality Act

1 51. The allegations in the above paragraphs are realleged and incorporated herein.

2 52. Petitioner is in pre-final order removal proceedings initiated by service of a Notice to
3 Appear and arrest pursuant to a Form I-200 warrant. His custody is therefore governed by 8 U.S.C. §
4 1226(a).

5 53. Section 1226(a) authorizes discretionary detention and expressly permits release on
6 bond or conditional parole pending a decision in removal proceedings.

7 54. Respondents' application of 8 U.S.C. § 1225(b) to Petitioner—more than two years after
8 placing him in § 1226(a) proceedings and releasing him on recognizance—contravenes the statutory
9 framework of the INA.
10

11 55. The INA does not authorize DHS to retroactively convert a § 1226(a) custody
12 determination into mandatory detention under § 1225(b) in the absence of a new lawful basis for
13 detention.
14

15 56. By denying Petitioner access to bond and continuing to detain him under an inapplicable
16 mandatory detention provision, Respondents are acting in excess of their statutory authority and in
17 violation of the INA.
18

19 57. Petitioner is therefore entitled to habeas relief declaring that his detention is governed
20 by § 1226(a) and ordering a bond hearing or release.
21

22 **COUNT FOUR**

23 **Violation of the Fourth Amendment – Unlawful Seizure**

24
25 58. The allegations in the preceding paragraphs are realleged and incorporated herein by
26 reference.

27 59. The Fourth Amendment to the United States Constitution guarantees the right of the
28 people to be secure in their persons against unreasonable searches and seizures. This protection extends

1 to all persons within the United States, regardless of immigration status.

2 60. A traffic stop constitutes a “seizure” within the meaning of the Fourth Amendment and
3 must be supported by at least reasonable suspicion that a traffic violation has occurred or that criminal
4 activity is afoot.

5 61. On December 23, 2025, Petitioner was lawfully operating a motor vehicle on a public
6 highway. He committed no traffic violation, equipment infraction, or moving violation. Law
7 enforcement lacked reasonable suspicion or probable cause to initiate a stop.
8

9 62. Nevertheless, Petitioner was pulled over, questioned, asked to produce documentation,
10 and detained. He was subsequently transferred into ICE custody.
11

12 63. The stop was not supported by reasonable suspicion or probable cause and therefore
13 constituted an unreasonable seizure in violation of the Fourth Amendment.

14 64. To the extent the stop was initiated or prolonged for the purpose of investigating
15 immigration status without independent lawful justification, it was unconstitutional. State or local
16 officers may not detain individuals solely to investigate civil immigration status absent independent
17 legal authority.
18

19 65. Petitioner’s current detention is the direct product of this unlawful seizure. But for the
20 unconstitutional stop, Petitioner would not have been taken into custody.

21 66. The Government may not rely on an unlawful seizure to justify continued physical
22 detention. Detention that flows from a constitutionally invalid stop violates the Fourth Amendment and
23 is not legally sustainable.
24

25 67. As a result of Respondents’ actions, Petitioner has been deprived of his liberty in
26 violation of the Fourth Amendment.

27 68. Petitioner is therefore entitled to habeas relief, including an order declaring the seizure
28

1 unlawful and ordering his release from custody, or, at minimum, an evidentiary hearing regarding the
2 legality of the stop and transfer to ICE

3 **PRAYER FOR RELIEF**

4 Wherefore, Petitioner requests this Court to grant the following:

- 5 1. Assume jurisdiction over this matter;
- 6 2. Enjoin Respondents from transferring Petitioner during the pendency of the instant action;
- 7 3. Declare that Petitioner's continued detention violates the Immigration and Nationality Act,
8 8 U.S.C. § 1226(a); and/or the Fifth Amendment to the U.S. Constitution;
- 9 4. Order Petitioner released from detention;
- 10 5. Grant Equal Access to Justice Act ("EAJA") fees and costs; and
- 11 6. Grant any other further relief this Court deems just and proper.
- 12
- 13
- 14

15 Respectfully,

16 /s/GURPREET KAUR

17 Gurpreet Kaur, Esq.

18 **Kaur Legal Group, PC**

19 674 County Square Dr, Suite 305

20 Ventura, CA 93003

21 Ph. 805-300-9003; Cell 909-997-4570

22 Fax: 805-716-6100

23 E-mail: gurpreetkauresq@gmail.com

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, and I submit this verification on his behalf. Because Petitioner is detained at the Denver Contract Detention Facility and immediate relief is sought, counsel verifies this petition on his behalf pursuant to 28 U.S.C. § 2242. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 16th day of February, 2026.

/s/GURPREET KAUR
Gurpreet Kaur, Esq.