

Songji Liang (Pro Se)

A [REDACTED]

C/O

Voice of Immigrants

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FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

2025 FEB 18 P 12:40

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA**

Songji Liang

Petitioner,

v.

Donald TRUMP,

President of United States of America

Kristen SULLIVA,

Acting Field Office Director for the Atlanta

ERO Field Office

Todd M. LYONS, Acting Director,
Immigration and Customs Enforcement,
U. S. Department of Homeland Security;

Kristi NOEM, in her Official Capacity,
Secretary, U.S. Department of Homeland
Security; and

Pam BONDI, in her Official Capacity,
Attorney General of the United States.

Respondents

NO.

**PETITION FOR WRIT OF HABEAS
CORPUS AND COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

Challenge to Unlawful Incarceration Under
Color of Immigration Detention Statutes;
Request for Declaratory and Injunctive Relief

INTRODUCTION

1. Petitioner, Songji Liang, has been civilly imprisoned by U.S. Immigration and Customs Enforcement (ICE) since October 18, 2023, and now was transferred from several facilities to D Day ICE Processing Center at 3262 HWY 252 East, Folkston, GA 31537. He is facing prolonged detention in violation of the Due Process Clause of the Fifth Amendment.

2. Petitioner has been detained for over two years and three months. Petitioner therefore respectfully requests that this Court issue a writ of habeas corpus, determine that Petitioner's detention is not justified because the government has not established by clear and convincing evidence that Petitioner presents a risk of flight or danger in light of available alternatives to detention, and order Petitioner's release, with appropriate conditions of supervision if necessary, taking into account Petitioner's ability to pay bond.

3. Alternatively, Petitioner requests that the Court issue a writ of habeas corpus and order Petitioner's release within 14 days unless Respondents schedule a hearing before an IJ where (1) to continue detention, the government must establish by clear and convincing evidence that Petitioner presents a risk of flight or danger, even after consideration of alternatives to detention that could mitigate any risk that Petitioner's release would present; and (2) if the government cannot meet its burden, the IJ shall order Petitioner's release on appropriate conditions of supervision, taking into account Petitioner's ability to pay a bond.

JURISDICTION

4. Petitioner is in the physical custody of Respondents. Petitioner is detained at the D Day ICE Processing Center in Folkston Georgia.

5. This action arises under the Due Process Clause of the Fifth Amendment of the U.S. Constitution. Jurisdiction is proper under 28 U.S.C. §§ 1331 (federal question), 2241 (habeas corpus); U.S. Const. Art. I, § 2; (Suspension Clause); and 5 U.S.C. § 702 (Administrative Procedure Act). This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et

1 seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. §
2 1651.

3 6. Congress has preserved judicial review of challenges to prolonged immigration
4 detention. See *Jennings v. Rodriguez*, 138 S. Ct. 830, 839-841 (2018) (holding that 8 U.S.C. §§
5 1226(e), 1252(b)(9) do not bar review of challenges to prolonged immigration detention); see
6 also *id.* at 876 (*Breyer, J.*, dissenting). (“8 U.S.C. § 1252(b)(9) . . . by its terms applies only with
7 respect to review of an order of removal”) (internal quotation marks and brackets omitted).
8

9 VENUE

10
11 7. Venue is proper in this District because this is the district in which Petitioner is
12 confined.

13 8. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because
14 Respondents are employees, officers, and agencies of the United States, and because a
15 substantial part of the events or omissions giving rise to the claims occurred in the Southern
16 District of Georgia.
17

18 REQUIREMENTS OF 28 U.S.C. § 2243

19 9. The Court must grant the petition for writ of habeas corpus or order Respondents to
20 show cause “forthwith,” unless the Petitioner is not entitled to relief. 28 U.S.C. § 2243. If an
21 order to show cause is issued, Respondents must file a return “within three days unless for good
22 cause additional time, not exceeding twenty days, is allowed.” *id.*
23

24 10. Habeas corpus is “perhaps the most important writ known to the constitutional law . . .
25 affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement.”
26 *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application for the writ usurps the
27 attention and displaces the calendar of the judge or justice who entertains it and receives prompt
28 action from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120
(9th Cir. 2000) (citation omitted).

PARTIES

11. Petitioner, Songji Liang, is a noncitizen currently detained by Respondents pending ongoing removal proceedings.

12. Respondent Donald TRUMP is the president of United States of America and he is sued in his official capacity.

13. Kristen SULLIVA is the Acting Field Office Director for the Atlanta ERO Field Office. As such, he is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

14. Respondent Todd M. Lyons is the Acting Director of Immigration and Customs Enforcement (ICE) and is responsible for ICE's policies, practices, and procedures, including those relating to the detention of immigrants. ICE is a legal custodian of Petitioner and Mr. Lyons is named in his official capacity.

15. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

16. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. She is sued in her official capacity.

FACTS

17. Petitioner is a citizen of China currently detained by Respondents pending immigration removal proceedings in the D Day ICE Processing Center. Petitioner is pursuing asylum, withholding of removal, and protection under the Convention Against Torture in the Immigration Court. Immigration Judge denied his application on July 25, 2024, based on factual

1 and legal errors. On Nov. 28, 2025, BIA granted the timely appeal and remanded the case to
2 Immigration Court for further proceedings consistent with BIA's opinion to enter a new decision.
3 The Immigration Court didn't schedule enter a new decision nor schedule a new hearing till
4 today.

5 18. Petitioner has been detained in DHS custody since October 18, 2023.

6 19. In light of recent changes in immigration law, requesting a bond hearing from the
7 immigration court is likely to be futile. Petitioner is charged with, inter alia, having entered the
8 United States without admission or inspection. See 8 U.S.C. § 1182(a)(6)(A)(i). On September 5,
9 2025, the Board of Immigration Appeals (BIA or Board) issued a precedent decision, binding all
10 immigration judges, holding that an immigration judge has no authority to consider bond requests
11 for any person who entered the United States without admission. See *Matter of Yajure Hurtado*,
12 29 1&N Dec. 216 (BIA 2025). The Board determined that such individuals are subject to
13 detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.
14

15 20. Pursuant to *Matter of Yajure Hurtado*, the immigration judge is unable to consider
16 Petitioner's bond request. Absent intervention by this Court, Petitioner cannot and will not be
17 provided with a bond hearing by a neutral decisionmaker to assess the propriety of Petitioner's
18 continued detention, which has become prolonged.
19

20 21. Petitioner has filed his application for asylum, withholding of removal, and protection
21 under the Convention Against Torture and all supporting evidence regarding persecution in
22 China owing to [REDACTED]
23

24 22. After BIA remanded the case to Immigration Court, there is no schedule of new
25 hearing or a new decision as instructed by BIA.

26 23. As of today, Petitioner has been detained in removal proceedings for over two years
27 and three months.
28

LEGAL FRAMEWORK

24. “It is well established that the Fifth Amendment entitles [noncitizens] to due process of law in deportation proceedings.” *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993)). “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty” that the Due Process Clause protects. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); see also *id.* at 718 (Kennedy, J., dissenting) (“Liberty under the Due Process Clause includes protection against unlawful or arbitrary personal restraint or detention.”). This fundamental due process protection applies to all noncitizens, including both removable and inadmissible noncitizens. See *id.* at 721 (Kennedy, J., dissenting) (“[B]oth removable and inadmissible [noncitizens] are entitled to be free from detention that is arbitrary or capricious”).

25. Due process requires that the government provide bond hearings to noncitizens facing prolonged detention. “The Due Process Clause foresees eligibility for bail as part of due process” because “[b]ail is basic to our system of law.” *Jennings*, 138 S. Ct. at 862 (Breyer, J., dissenting) (internal quotation marks omitted). While the Supreme Court upheld the mandatory detention of a noncitizen under Section 1226(c) in *Demore*, it did so based on the petitioner’s concession of deportability and the Court’s understanding at the time that such detentions are typically “brief.” *Demore*, 538 U.S. at 522 n.6, 528. Where a noncitizen has been detained for a prolonged period or is pursuing a substantial defense to removal or claim to relief, due process requires an individualized determination that such a significant deprivation of liberty is warranted. *Id.* at 532 (Kennedy, J., concurring) (“[I]ndividualized determination as to his risk of flight and dangerousness” may be warranted “if the continued detention became unreasonable or unjustified”); see also *Jackson v. Indiana*, 406 U.S. 715, 733 (1972) (holding that detention beyond the “initial commitment” requires additional safeguards); *McNeil v. Dir., Patuxent Inst.*, 407 U.S. 245, 249-50 (1972) (holding that “lesser safeguards may be appropriate” for “short term confinement”); *Hutto v. Finney*, 437 U.S. 678, 685-86 (1978) (holding that, in the Eighth

Amendment context, “the length of confinement cannot be ignored in deciding whether [a] confinement meets constitutional standards”); *Reid v. Donelan*, 17 F Ath 1, 7 (1st Cir. 2021) (holding that “the Due Process Clause imposes some form of reasonableness limitation upon the duration of detention” under section 1226(c)) (internal quotation marks omitted).

A. Detention That Exceeds Six Months Without A Bond Hearing Is Unconstitutional.

26. Detention without a bond hearing is unconstitutional when it exceeds six months. See *Demore*, 538 U.S. at 529-30 (upholding only “brief” detentions under Section 1226(c), which last “roughly a month and a half in the vast majority of cases in which it is invoked, and about five months in the minority of cases in which the [noncitizen] chooses to appeal”); *Zadvydas*, 533 U.S. at 701 (“Congress previously doubted the constitutionality of detention for more than six months.”); Other District Court has the same opinion. (See *Rodriguez v. Nielsen*, 2019 WL 7491555, at *6 (N.D. Cal. Jan. 7, 2019) (“[D]etention becomes prolonged after six months and entitles [Petitioner] to a bond hearing”).

27. The recognition that six months is a substantial period of confinement—and is the time after which additional process is required to support continued incarceration—is deeply rooted in our legal tradition. With few exceptions, “in the late 18th century in America crimes triable without a jury were for the most part punishable by no more than a six-month prison term.” *Duncan v. Louisiana*, 391 U.S. 145, 161 & n.34 (1968). Consistent with this tradition, the Supreme Court has found six months to be the limit of confinement for a criminal offense that a federal court may impose without the protection afforded by jury trial. *Cheff v. Schnackenberg*, 384 U.S. 373, 380 (1966) (plurality opinion). The Court has also looked to six months as a benchmark in other contexts involving civil detention. See *McNeil v. Dir., Patuxent Inst.*, 407 U.S. 245, 249, 250-52 (1972) (recognizing six months as an outer limit for confinement without individualized inquiry for civil commitment). The Court has likewise recognized the need for bright line constitutional rules in other areas of law. See *Maryland v. Shatzer*, 559 U.S. 98, 110

(2010) (holding that 14 days must elapse following invocation of *Miranda* rights before re-interrogation is permitted); *Cnty. of Riverside v. McLaughlin*, 500 U.S. 44, 55-56 (1991)(holding that a probable cause hearing must take place within 48 hours of warrantless arrest).

B. Even Absent A Bright-Line Six-Month Standard, An Individualized Bond Hearing Is Required When Detention Becomes Unreasonably Prolonged.

28. The balance test by other district court support an individualized bond hearing when detention became unreasonably prolonged.

29. Courts in the Southern District of California have taken the position that the three factor test outlined in *Lopez v. Garland*, 631 F.Supp.3d 870 (E.D. Cal. Sept. 29, 2022), is appropriate to consider when determining whether a non-citizen detainee's prolonged detention has become so unreasonable as to require an initial bond hearing. See *Durand v. Allen*, 2024 WL 711607 (S.D. Cal. Feb. 21, 2024), *Sibomana v. LaRose*, WL 3028093 (S.D. Cal. April 20, 2023); *Sanchez-Rivera v. Matuszewski*, 2023 WL 139801 (S.D. Cal. Jan. 9, 2023).. The *Lopez* factors, in turn, look at (1) the total length of detention to date; (2) the likely duration of future detention; and (3) the delays in the removal proceedings caused by the petitioner and the government. *Lopez*, 631 F. Supp. 3d at 869. As explained below, each of these three factors favors the Petitioner.

30. Petitioner's detention, without any individualized review, is unreasonable under the test set out in *Lopez v. Garland*, 631 F.Supp.3d 870 (E.D. Cal. Sept. 29, 2022), and each of these three factors favors the Petitioner.

31. First, Petitioner has experienced detention of a significant and prolonged duration. Petitioner, who has been held in carceral conditions for over two years and three months and been transferred several occasions, has already has indisputably experienced a significant length of civil detention, thus satisfying the first of the three *Lopez* factors.

32. Second, the likelihood that the Petitioner will suffer additional detention in the future is great, thus satisfying the second of the three *Lopez* factors. The Petitioner is not scheduled for a new hearing on his asylum application nor a new decision. It is also possible that the

Immigration Judge entered the second decision to deny his asylum application. Furthermore, should the Petitioner be granted relief, DHS may choose to appeal the case and argue that the Petitioner can remain detained through the pendency of another multi-month or years appeal process, which may result in the second remand back to the immigration court or a subsequent petition for review to the Circuit Court of Appeals during which he may continue to experience detention. For these reasons, the Petitioner has shown that he can satisfy the second factor in the *Lopez* test.

33. Third, the vast majority of delays in these proceedings have caused by the government. Here, ICE first erroneously found a negative credible fear which was vacated by Immigration Court. Immigration Judge erroneously denied his asylum application and ordered removal, which was remanded by BIA for a new decision on November 28, 2025. More than two months passed, but Immigration Court didn't schedule a new hearing nor entered a new decision. For these reasons, it is evident that significant delays in Petitioner's case were on account of Defendants' actions, thus satisfying the last of the three *Lopez* factors.

34. As noted, Petitioner has been detained for a substantial length of time, and Petitioner's detention is likely to continue as Petitioner asserts his right to seek immigration relief. Noncitizens should not be punished for pursuing "legitimate proceedings" to seek relief. See *Masood v. Barr*, 2020 WL 95633, at *3 (N.D. Cal. Jan. 8, 2020) ("[I]t ill suits the United States to suggest that [Petitioner] could shorten his detention by giving up these rights and abandoning his asylum application."). Moreover, Petitioner's confinement and experiences at a facility operated by a private, for-profit prison contractor, demonstrate that his conditions of confinement are not meaningfully different from those of criminal punishment.

B. At Any Hearing, The Government Must Justify Ongoing Detention By Clear And Convincing Evidence.

35. At a bond hearing, due process requires certain minimum protections to ensure that a noncitizen's detention is warranted: the government must bear the burden of proof by clear and convincing evidence to justify continued detention, taking into consideration available

1 alternatives to detention; and, if the government cannot meet its burden, the noncitizen's ability
2 to pay a bond must be considered in determining the appropriate conditions of release.

3 36. To justify prolonged immigration detention, the government must bear the burden of
4 proof by clear and convincing evidence that the noncitizen is a danger or flight risk.

5
6 37. Where the Supreme Court has permitted civil detention in other contexts, it has relied
7 on the fact that the Government bore the burden of proof by at least clear and convincing
8 evidence. See *United States v. Salerno*, 481 U.S. 739, 750, 752 (1987) (upholding pre-trial
9 detention after a "full-blown adversary hearing" requiring "clear and convincing evidence" and
10 "a neutral decisionmaker"); *Foucha v. Louisiana*, 504 U.S. 71, 81-83 (1992) (striking down civil
11 detention scheme that placed burden on the detainee); *Zadvydas*, 533 U.S. at 692 (finding
12 post final-order custody review procedures deficient because, inter alia, they placed burden on
13 detainee).

14
15 38. The requirement that the government bear the burden of proof by clear and convincing
16 evidence is also supported by application of the three-factor balancing test from *Mathews v.*
17 *Eldridge*, 424 U.S. 319, 335 (1976). First, "an individual's private interest in 'freedom from
18 prolonged detention' is 'unquestionably substantial.'" See *Rodriguez Diaz*, 53 F.4th at 1207
19 (citing *Singh*, 638 F.3d at 1208). Second, the risk of error is great where the government is
20 represented by trained attorneys and detained noncitizens may lack English proficiency. See
21 *Santosky v. Kramer*, 455 U.S. 745, 763 (1982) (requiring clear and convincing evidence at
22 parental termination proceedings because "numerous factors combine to magnify the risk of
23 erroneous factfinding" including that "parents subject to termination proceedings are often poor,
24 uneducated, or members of minority groups" and "[t]he State's attorney usually will be expert on
25 the issues contested"). Moreover, detained noncitizens are incarcerated in prison like conditions
26 that severely hamper their ability to gather evidence and prepare for a bond hearing. Third,
27 placing the burden on the government imposes minimal cost or inconvenience to it, as the
28

1 government has access to the noncitizen's immigration records and other information that it can
2 use to make its case for continued detention.

3 **D. Due Process Requires Consideration Of Alternatives To Detention.**

4 39. Due process also requires consideration of alternatives to detention. The primary
5 purpose of immigration detention is to ensure a noncitizen's appearance during civil removal
6 proceedings. *Zadvydas*, 533 U.S. at 697. Detention is not reasonably related to this purpose if
7 there are alternative conditions of release that could mitigate risk of flight. See *Bell v. Wolfish*,
8 441 U.S. 520, 538-39 (1979) (civil pretrial detention may be unconstitutionally punitive if it is
9 excessive in relation to its legitimate purpose). ICE's alternatives to detention program—the
10 Intensive Supervision Appearance Program—has achieved extraordinary success in ensuring
11 appearance at removal proceedings, reaching compliance rates close to 100 percent. *Hernandez v.*
12 *Sessions*, 872 F.3d 976, 991 (9th Cir. 2017) (observing that ISAP “resulted in a 99% attendance
13 rate at all EOIR hearings and a 95% attendance rate at final hearings”). Thus, alternatives to
14 detention must be considered in determining whether prolonged incarceration is warranted.
15

16 40. Due process likewise requires consideration of a noncitizen's ability to pay a bond.
17 “Detention of an indigent ‘for inability to post money bail’ is impermissible if the individual’s
18 ‘appearance at trial could reasonably be assured by one of the alternate forms of release.’”
19 *Hernandez*, 872 F.3d at 990 (quoting *Pugh v. Rainwater*, 572 F.2d 1053, 1058 (5th Cir. 1978) (en
20 banc)). Therefore, when determining the appropriate conditions of release for people detained for
21 immigration purposes, due process requires “consideration of financial circumstances and
22 alternative conditions of release.” *Id.*; see also *Martinez v. Clark*, 36 F.4th 1219, 1231 (9th Cir.
23 2022) (“While the government had a legitimate interest in protecting the public and ensuring the
24 appearance of noncitizens in immigration proceedings, we held [in *Hernandez*] that detaining an
25 indigent alien without consideration of financial circumstances and alternative release conditions
26 was ‘unlikely to result’ in a bond determination ‘reasonably related to the government’s
27 legitimate interests.’ (citation omitted).”).
28

CLAIM FOR RELIEF

**VIOLATION OF THE DUE PROCESS CLAUSE OF THE FIFTH AMENDMENT TO
THE U.S. CONSTITUTION**

41. Petitioner re-alleges and incorporates by reference the paragraphs above.

42. The Due Process Clause of the Fifth Amendment forbids the government from depriving any "person" of liberty "without due process of law." U.S. Const. amend. V.

43. To justify Petitioner's ongoing prolonged detention, due process requires that the government establish, at an individualized hearing before a neutral decisionmaker, that Petitioner's detention is justified by clear and convincing evidence of flight risk or danger, taking into account whether alternatives to detention could sufficiently mitigate that risk.

44. For these reasons, Petitioner's ongoing prolonged detention without a hearing violates his right to due process.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

a. Assume jurisdiction over this matter;

b. Issue a Writ of Habeas Corpus, determine that Petitioner's detention is not justified because the government has not established by clear and convincing evidence that Petitioner presents a risk of flight or danger in light of available alternatives to detention, and order Petitioner's release (with appropriate conditions of supervision if necessary), taking into account Petitioner's ability to pay a bond;

c. In the alternative, issue a Writ of Habeas Corpus and order Petitioner's release within 14 days unless Respondents schedule a hearing before an immigration judge where: (1) to continue detention, the government must establish by clear and

- 1 convincing evidence that Petitioner presents a risk of flight or danger, even after
2 consideration of alternatives to detention that could mitigate any risk that
3 Petitioner's release would present; and (2) if the government cannot meet its
4 burden, the immigration judge order Petitioner's release on appropriate conditions
5 of supervision, taking into account Petitioner's ability to pay a bond;
6
7 d. Issue a declaration that Petitioner's ongoing prolonged detention violates the Due
8 Process Clause of the Fifth Amendment.
9
10 e. Issue an order enjoining the Respondent's from removing the Plaintiff from the
11 United States or transferring him from the Southern District of California while
12 this matter is pending;
13
14 f. Grant such further relief as the Court deems just and proper.

15
16 Respectfully submitted this February 7, 2026.

17 By:

18 *Songji Liang*

19 Songji Liang (Pro Se)
20 C/O Voice of Immigrants
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22 Monterey Park CA 91754
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EXHIBIT 1

IJ'S DECISION VACATING

DHS'S NEGATIVE DETERMINATION OF CREDIBLE FEAR



**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
LASALLE IMMIGRATION COURT**

Respondent Name:

LIANG, SONGJI

To:

FU, ZHIGENG

556 N DIAMOND BAR BLVD STE 108

DIAMOND BAR, CA 91765

A-Number:



Riders:

In Credible Fear Review Proceedings

Initiated by the Department of Homeland Security

Date:

01/12/2024

ORDER OF THE IMMIGRATION JUDGE

On 01/12/2024, a review of the Department of Homeland Security's (DHS) credible fear determination was held in this matter. This Court considered testimony and any documentary evidence submitted regarding the Applicant's background fear of returning to their country of origin or last habitual residence.

Upon de novo consideration, the Court makes the findings below –

[complete section (1), then complete either section (2) or (3)]

(1)– For all cases

A. The Applicant –

☒ Is covered by the presumption of asylum ineligibility at 8 C.F.R. § 1208.33(a)(1)-(2),

or

☐ Is not covered by the presumption of asylum ineligibility at 8 C.F.R. § 1208.33(a)(1)-(2).

B. If the Applicant is covered by the presumption of asylum ineligibility, the Applicant –

☐ Has rebutted the presumption under 8 C.F.R. § 1208.33(a)(3),

or

☒ Has not rebutted the presumption under 8 C.F.R. § 1208.33(a)(3).

(2)– IF the Applicant is not covered by the presumption OR has rebutted the presumption

A. The Applicant has established a significant possibility of eligibility for [check all that apply] –

☐ Asylum under section 208 of the Immigration and Nationality Act (Act) or withholding of removal under section 241(b)(3) of the Act

☐ Withholding of removal under the Convention Against Torture (CAT)

B. If the Applicant has established a significant possibility of eligibility for *asylum under section 208 of the Act* or *withholding of removal under section 241(b)(3) of the Act* –

The persecution (1) took or would take the following form(s), and (2) was or would be carried out by the following person, people, or group(s):

A sufficient nexus exists between the persecution and the Applicant's *[check all that apply]*:

- ☐ Race
- ☐ Religion
- ☐ Nationality
- ☐ Membership in a particular social group
- ☐ Political opinion

C. If the Applicant has established a significant possibility of eligibility for withholding of removal under the CAT –

The torture would (1) take the following form(s) and (2) be carried out by the following person, people, or groups(s):

[after completing section (2), proceed to the end of this form and issue order (A)]:

(3)– IF the Applicant is covered by the presumption AND has not rebutted the presumption

A. The Applicant has established a reasonable possibility of *[check all that apply]* –

☒ Persecution (meaning a reasonable possibility of being persecuted because of their race, religion, nationality, political opinion, or membership in a particular social group)

☒ Torture

B. If the Applicant has established a reasonable possibility of *persecution* —

The persecution (1) took or would take the following form(s), and (2) was or would be carried out by the following person, people, or group(s):

[REDACTED]

The persecution was or would be because of the Applicant's *[check all that apply]*:

- ☐ Race
- ☐ Religion
- ☐ Nationality
- ☐ Membership in a particular social group
- ☒ Political opinion

C. If the Applicant has established a reasonable possibility of *torture* –

The torture would (1) take the following form and (2) be carried out by the following person, people, or groups(s):

same as above

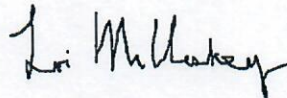
[after completing section (3), proceed to the end of this form and issue order (B)]

Based on the findings above, the Court issues the following order –

IT IS HEREBY ORDERED THAT:–

- ☐ (A) As the Applicant has established a *significant possibility* of eligibility for asylum under section 208 of the Act, withholding of removal under section 241(b)(3) of the Act, or withholding of removal under the CAT, the removal order is **VACATED**, and the case is returned to DHS for further proceedings before DHS, or for DHS to commence removal proceedings. *See* 8 C.F.R. §§ 208.33(b)(2)(v)(A), 1208.30(g)(2)(iv)(B), 1208.33(b)(2)(i), (b)(3).
- ☒ (B) As the Applicant has established a *reasonable possibility* of persecution or torture, the removal order is **VACATED**, and the case is returned to DHS for DHS to commence removal proceedings. *See* 8 C.F.R. §§ 208.33(b)(2)(v)(B), 1208.33(b)(2)(ii), (b)(3).

This is a final order. There is no appeal from this decision.



Immigration Judge: MCCLESKEY, LOI 01/12/2024

Certificate of Service

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To: ☐] Noncitizen | ☐] Noncitizen c/o custodial officer | ☐ E] Noncitizen's atty/rep. | ☐ E] DHS

Respondent Name : LIANG, SONGJI | **A-Number :** 

Riders:

Date: 01/12/2024 **By:** Rosa Rodriguez, Court Staff

EXHIBIT 2

IJ'S DECISION DENIED PETITIONER'S ASYLUM APPLICATION

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
United States Immigration Court
7619 Little River Turnpike, Suite 400
Annandale, VA 22003**

IN THE MATTER OF:

LIANG, Songji,

Respondent.

IN REMOVAL PROCEEDINGS

File No.: A



CHARGES:

Section 212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended ("INA" or "Act"), as a noncitizen present in the United States without being admitted or paroled, or who arrives in the United States at any time or place other than as designated by the Attorney General.

Section 212(a)(7)(A)(i)(I) of the Immigration and Nationality Act ("INA"), as amended, as a noncitizen who, at the time application for admission, is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.

APPLICATIONS:

Asylum, pursuant to INA § 208; withholding of removal, pursuant to INA § 241(b)(3); and protection under the United Nations Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment ("Convention Against Torture" or "CAT"), pursuant to 8 C.F.R. §§ 1208.16-.18.

ON BEHALF OF RESPONDENT:

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ON BEHALF OF DHS:

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7619 Little River Turnpike, Suite 900
Annandale, VA 22003

In the Matter of: Songji Liang
A No.: 

of torture. The evidence is too speculative to meet the burden of proof. *See Rodriguez-Arias*, 915 F.3d at 973. Based on the record of evidence, the Court finds the probability of harm does not exceed fifty percent. *See Rodriguez-Arias v. Whitaker*, 915 F.3d 968, 973-74 (4th Cir. 2019).

The Court finds that Respondent failed to establish that it is more likely than not he would be tortured in China by, at the instigation of, or with the consent or acquiescence of a public official or other person acting in an official capacity. *See* 8 C.F.R. § 1208.18(a)(1). Accordingly, his application for protection under CAT is denied.

IV. CONCLUSION

Respondent's incredible, uncorroborated testimony failed to meet his burden of proof. Accordingly, his applications for asylum and withholding of removal are denied. Additionally, Respondent failed to establish he is more likely than not to be tortured by, at the instigation of, or with the consent or acquiescence of, officials or persons acting in such a capacity in China. The Court, therefore, denies all requests for relief.

Accordingly, the Court enters the following orders.

ORDERS

<u>It Is Ordered that:</u>	Respondent's application for asylum pursuant to INA § 208(a) be DENIED .
<u>It Is Further Ordered that:</u>	Respondent be REMOVED to the People's Republic of China.
<u>It Is Further Ordered that:</u>	Respondent's application for withholding of removal pursuant to INA § 241(b)(3) be DENIED .
<u>It Is Further Ordered that:</u>	Respondent's application for protection under the CAT be DENIED .

25 July 2024
Date

John Cody Barnes
John C. Barnes
United States Immigration Judge

APPEAL RIGHTS: Both parties have the right to appeal the decision in this case. Any appeal is due at the Board of Immigration Appeals on or before thirty (30) calendar days from the date of service of this decision.

NOTICE OF CRIMINAL AND CIVIL CONSEQUENCES FOR FAILURE TO DEPART:

The court has denied your applications for relief and ordered you removed from the United States. The law requires the court inform you of civil and criminal penalties that could be levied against you if you fail to depart the United States. INA § 240(c)(5); 8 C.F.R. § 1240.13(d).

In the Matter of: Songji Liang

A No.: 

CIVIL PENALTIES FOR FAILURE TO DEPART:

Pursuant to INA § 274D(a), the Department of Homeland Security shall fine you not more than \$942 per day for each day that you:

- (1) willfully fail or refuse to:
 - (A) depart the United States pursuant to a final order of removal;
 - (B) make timely application in good faith for travel or other documents necessary for departure;
 - (C) present for removal at the time and place required by the Attorney General; or
- (2) conspire to or take any action designed to prevent or hamper your departure pursuant to a final order of removal.

CRIMINAL AND CIVIL PENALTIES FOR FAILURE TO DEPART:

Pursuant to INA § 243(a)(1), any alien who is subject to a final order of removal by reason of being a member of any of the classes described in INA § 237(a), who:

- (A) willfully fails or refuses to depart from the United States within a period of 90 days from the date of the final order of removal under administrative processes, or if judicial review is had, then from the date of the final order of the court,
- (B) willfully fails or refuses to make timely application in good faith for travel or other documents necessary to the alien's departure,
- (C) connives or conspires, or takes any other action, designed to prevent or hamper or with the purpose of preventing or hampering the alien's departure pursuant to such, or
- (D) willfully fails or refuses to present himself or herself for removal at the time and place required by the Attorney General pursuant to such order,

shall be fined under Title 18 of the United States Code, or imprisoned not more than 4 years (or 10 years if you are a member of any of the classes described in INA § 237(a)(1)(E), (2), (3), or (4)), or both. However, you are not subject to these penalties for "any proper steps for the purpose of securing cancellation of or exemption from such order of removal or for the purpose of securing the alien's release from incarceration or custody." INA § 243(a)(2).

EXHIBIT 3

BIA'S DECISION REMANDING PETITIONER'S CASE TO IMMIGRATION COURT



U.S. Department of Justice

Executive Office for Immigration Review

*Board of Immigration Appeals
Office of the Clerk*

5107 Leesburg Pike, Suite 2000
Falls Church, Virginia 22041



**FU, ZHIGENG
GLOBAL LAW OFFICE LLC
556 N DIAMOND BAR BLVD STE 108
DIAMOND BAR CA 91765**

**DHS/ICE Office of Chief Counsel - WAS
500 12TH STREET, SW, STOP 5202
WASHINGTON DC 20536-5902**

Name: LIANG, SONGJI

A 

Date of this Notice: 11/20/2025

Enclosed is a copy of the Board's decision and order in the above-referenced case.

Sincerely,

A handwritten signature of John Seiler is located below the word "Sincerely,".

John Seiler
Acting Chief Clerk

Enclosure

Userteam: Docket



U.S. Department of Justice

Executive Office for Immigration Review

Board of Immigration Appeals

Office of the Clerk

5107 Leesburg Pike, Suite 2000
Falls Church, Virginia 22041

LIANG, SONGJI

A [REDACTED]

**DHS/ICE Office of Chief Counsel - WAS
500 12TH STREET, SW, STOP 5202
WASHINGTON DC 20536-5902**

Name: LIANG, SONGJI

A [REDACTED]

Date of this Notice: 11/20/2025

Enclosed is a copy of the Board's decision in the above-referenced case. This copy is being provided to you as a courtesy. Your attorney or representative has been served with this decision pursuant to 8 C.F.R. § 1292.5(a). If the attached decision orders that you be removed from the United States or affirms an Immigration Judge's decision ordering that you be removed, any petition for review of the attached decision must be filed with and received by the appropriate court of appeals within 30 days of the date of the decision.

Sincerely,

A handwritten signature in black ink, appearing to read "John Seiler", is written over a horizontal line.

John Seiler
Acting Chief Clerk

Enclosure

Userteam: Docket

NOT FOR PUBLICATION

**U.S. Department of Justice
Executive Office for Immigration Review
Board of Immigration Appeals**

MATTER OF:

Songji LIANG, A 

Respondent

FILED

Nov 20, 2025

ON BEHALF OF RESPONDENT: Zhigeng Fu, Esquire

ON BEHALF OF DHS: Ann Atalla, Assistant Chief Counsel

IN REMOVAL PROCEEDINGS

On Appeal from a Decision of the Immigration Court, Annandale, VA

Before: Gemoets, Appellate Immigration Judge; Hunsucker, Appellate Immigration Judge;
Mazzie, Temporary Appellate Immigration Judge¹

Opinion by Appellate Immigration Judge Gemoets

GEMOETS, Appellate Immigration Judge

The respondent, a native and citizen of China, appeals from the Immigration Judge's decision, dated July 25, 2024, denying his applications for asylum, withholding of removal, and protection under the regulations implementing the Convention Against Torture ("CAT").² Sections 208(b)(1)(A) and 241(b)(3)(A) of the Immigration and Nationality Act ("INA"), 8 U.S.C. §§ 1158(b)(1)(A), 1231(b)(3)(A). The Department of Homeland Security ("DHS") opposes the appeal. The record will be remanded for further proceedings and the entry of a new decision.

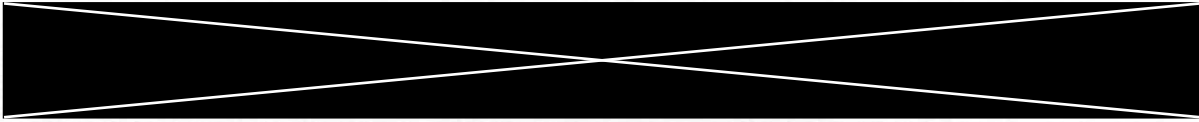
We review findings of fact determined by an Immigration Judge, including credibility findings, under a "clearly erroneous" standard. 8 C.F.R. § 1003.1(d)(3)(i). We review questions of law, discretion, and judgment, and all other issues in appeals from decisions of Immigration Judges de novo. 8 C.F.R. § 1003.1(d)(3)(ii).

¹ Temporary Appellate Immigration Judges sit pursuant to appointment by the Attorney General. *See generally* 8 C.F.R. § 1003.1(a)(1), (4).

² The Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Dec. 10, 1984, S. Treaty Doc. No. 100-20, 1465 U.N.T.S. 85 (entered into force for United States Nov. 20, 1994). 8 C.F.R. §§ 1208.16(c)-1208.18.

(continued...)

A 



Consequently, we will remand the record for additional consideration of the respondent's applications for asylum, withholding of removal, and protection under the CAT. Both parties should have the opportunity to update the record. The Immigration Judge may take any other action he deems appropriate for resolution of the respondent's case. In remanding, we express no opinion regarding the ultimate outcome of these proceedings.

Accordingly, the following order will be entered.

ORDER: The record is remanded to the Immigration Judge for further proceedings consistent with the foregoing opinion and for the entry of a new decision.

EXHIBIT 4

AUTOMATED CASE INFORMATION WITHOUT HEARING DATE

2026/2/7 21:13

Automated Case Information

 An official website of the United States government
Here's how you know



EOIR Automated Case Information

Court Closures Today February 7, 2026

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

[Home](#) > **LIANG, SONGJI** 



Automated Case Information

Name: LIANG, SONGJI | A-Number:  |

Docket Date: 2/6/2024



Next Hearing Information



There are no future hearings for this case.



Court Decision and Motion Information

2026/2/7 21:13

Automated Case Information



BIA Case Information

No appeal was received for this case.

Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS

7619 LITTLE RIVER TPK., 4TH FL
ANNANDALE, VA 22003

PHONE NUMBER

(703) 343-4000

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Accessibility

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Legal Policies & Disclaimers

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Budget & Performance

Office of the Inspector General

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

SONGJI LIANG

(b) County of Residence of First Listed Plaintiff Charlton

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

N/A

DEFENDANTS

Donald TRUMP; Kristen SULLIVA; Todd M. LYONS; Kristi NOEM; Pan BONDI in their official capacities.

County of Residence of First Listed Defendant Charlton

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

UNKNOWN

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice	PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
US Constitution Amend V.Brief description of cause:
Challenge to Unlawful Incarceration**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

02/07/2026

SIGNATURE OF ATTORNEY OF RECORD

Liang Songji

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

JS 44 Reverse (Rev. 08/18)

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; NOTE: federal question actions take precedence over diversity cases.)
- III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation - Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation - Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless diversity. Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. **Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

Songji Liang (Pro Se)

A: 

C/O Voice of Immigrants

228 N Garfield Ave STE 202

Monterey Park CA 91754

Email: voimmigrants@gmail.com

FILED
U.S. DISTRICT COURT
SOUTHERN DIST. OF GA.

2026 FEB 18 P 12:40

mr 02/07/2026

TO:

Clerk, U.S. District Court
Southern District of Georgia
124 Barnard Street
Savannah, GA 31401

RE: Filing – Waycross Division

Case Type: Habeas Corpus (28 U.S.C. § 2241)

Petitioner: Songji Liang

Detention Facility: D. Ray James (D-Day) ICE Processing Center

Location: Folkston, Georgia

Dear Clerk:

Enclosed please find the following documents for filing in the United States District Court for the Southern District of Georgia, Waycross Division:

1. Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241
2. Motion for Temporary Restraining Order
3. \$5.00 filing fee check payable to:
“Clerk, U.S. District Court”
4. Supporting Exhibits

Please file the enclosed documents and assign a case number. Kindly return a file-stamped copy if permitted.

Thank you for your assistance.

Respectfully submitted,

Liang Songji

Songji Liang

Pro Se

Filing Fee Paid 400003091