

1 Ramanujan Nadadur (Cal Bar No. 315718)  
2 (Email: Anuj\_Nadadur@nskumarlaw.com)  
3 11620 Wilshire Blvd, Suite 250  
4 Los Angeles, California 90025  
5 Telephone: (310) 479-1383  
6 Facsimile: (310) 479-1393

7 Attorneys for Petitioner  
8 SARABJEET SINGH

9 **UNITED STATES DISTRICT COURT**  
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11  
12 SARABJEET SINGH,  
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14 Petitioner,

15 v.

16 WARDEN, IMPERIAL REGIONAL  
17 DETENTION CENTER; KRISTI NOEM,  
18 Secretary, U.S. Department of Homeland  
19 Security, PAM BONDI, ATTORNEY  
20 GENERAL OF THE UNITED STATES

21 Respondents.  
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Case No. 3:26-cv-01308-LL-BLM

**JOINT STATUS REPORT**



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Respectfully submitted,

DATED: March 5, 2026

By */s/ Ramanujan Nadadur*

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Ramanujan Nadadur  
Counsel for Petitioner

DATED: March 5, 2026

By */s/ Juliet Keene*

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Juliet Keene  
Assistant United States Attorney  
Counsel for Respondents

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1 Ramanujan Nadadur (Cal Bar No. 315718)  
2 (Anuj\_Nadadur@nskumarlaw.com)  
3 Law Offices of Nadadur S. Kumar  
4 11620 Wilshire Blvd. Suite 250  
5 Los Angeles, CA 90025  
6 (310) 479-1383  
7 Attorneys for Petitioner  
8 SARABJEET SINGH

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11 **UNITED STATES DISTRICT COURT**  
12 **SOUTHERN DISTRICT OF CALIFORNIA**  
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14 SARABJEET SINGH (A# 215-908-651)

15 Petitioner,

16 v.

17 WARDEN, IMPERIAL REGIONAL  
18 DETENTION FACILITY, ET AL.

19 Respondents.  
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Case No. 3:26-cv-01308-LL-BLM

**PETITIONER'S REPLY IN  
SUPPORT OF APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER; DECLARATION OF  
COUNSEL; EXHIBIT**

1 (E.D. Cal. July 9, 2009); *see, e.g., Braden v. 30th Judicial Circuit Court*, 410 U.S. 484  
2 (1973) (“The important fact to be observed in regard to the mode of procedure upon [a  
3 writ of habeas corpus], that it is directed to, and served upon . . . [the] jailer . . .  
4 compelling the oppressor to release [the petitioner’s] constraint”). In order to determine  
5 the proper venue for a petition under 28 U.S.C. § 2241 the court must first determine  
6 which district has jurisdiction over the entity capable of effecting  
7 relief. *See Padilla*, 542 U.S. at 445–47 (discussing requirement that district court have  
8 jurisdiction over proper respondent capable of effecting relief in order to entertain  
9 petition); *see also Wheeler v. United States*, 640 F.2d 1116, 1121 n. 7 (9th  
10 Cir.1998) (stating that a court must have a respondent over whom it can assert  
11 jurisdiction in order to entertain a habeas petition).

12 In attempting to respond to the petition filed in this case on March 2, 2026, it was  
13 discovered that Petitioner had already been transferred to the Pine Prairie Immigration  
14 and Customs Enforcement (ICE) Processing Center in Pine Prairie, Louisiana on March  
15 5, 2026. Here, where the sole respondent named in this case is not Petitioner’s  
16 immediate custodian, and where the Court lacks jurisdiction over the entity capable of  
17 affecting the relief sought, venue is not proper in the Southern District of California.  
18 Because the habeas petition is not in a proper venue, the Court may either dismiss the  
19 petition or transfer it to the correct venue, if transfer is “in the interest of justice.” *See*  
20 28 U.S.C § 1406(a).

21 DATED: March 19, 2026

ADAM GORDON  
United States Attorney

22  
23 *s/ Tom Merritt*  
TOM MERRITT  
Assistant United States Attorney  
Attorneys for Respondents  
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1 *Tanner Motor Livery, Ltd. v. Avis, Inc.*, 316 F.2d 804, 809 (9th Cir. 1963). The  
2 analysis for a TRO and a preliminary injunction is the same. *Frontline Med. Assoc.*  
3 *Inc. v. Coventry Healthcare Workers Compensation, Inc.*, 620 F.  
4 Supp. 2d 1109, 1110 (C D. Cal. 2009).

5  
6 To obtain a preliminary injunction, a Petitioner "must establish [1] that he is  
7 likely to succeed on the merits. [2] that he is likely to suffer irreparable harm in the  
8 absence of preliminary relief, [3] that the balance of equities tips in their favor, and  
9 [4] that an injunction is in the public interest." *City and County of San Francisco*  
10 *v. USCIS*, 944 F.3d 773, 788-89 (9th Cir. 2019) (quoting *Winter v. Nat. Res. Def*  
11 *Council, Inc.*, 555 U.S. 7, 20 (2008)). "Likelihood of success on the merits is the  
12 most important factor" *California v. Azar*, 911 F.3d 558, 575 (9th Cir. 2018)  
13 (quotations omitted). If the first two factors are met, the third and fourth factors  
14 merge when the government is the opposing party. *Nken v. Holder*, 556 U.S. 418,  
15 435 (2009).  
16

17 Additionally, in the Ninth Circuit, courts also "employ an alternative  
18 'serious questions' standard, also known as the 'sliding scale' variant of the  
19 *Winter* standard." *Fraihat v. U.S Immigr. & Customs Enft*, 16 F.4th 613,635 (9th  
20 Cir. 2021) (quotations and citations omitted and alterations accepted). "Under that  
21 formulation, 'serious questions going to the merits' and a balance of hardships  
22 that tips sharply towards the Petitioner[s] also show that there is a likelihood of  
23 irreparable injury and that the injunction is in the public interest." *Id.* (quoting *All.*  
24 *for the Wild Rokies v. Cottrell*, 632 F.3d 1127, 1134 (9th Cir. 2011)).  
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26 **B. Petitioner is likely to prevail on the merits.**

27 I. Petitioner is likely to prevail on the merits of his Petition for Writ of  
28 Habeas Corpus because Respondent have filed a Return to Habeas Petition and

1 96. On information and belief, Respondents have made no substantiated finding that the  
2 Petitioner is a flight risk, in fact, the Petitioner has never failed to appear for immigration  
3 proceedings.

4 97. By detaining the Petitioner, the Respondents have abused their discretion.  
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8 **PRAYER FOR RELIEF**

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

- 10 1. Assume jurisdiction over this matter;
- 11 2. Issue an Order to Show Cause ordering Respondents to show cause why this Petition  
12 should not be granted within three (3) days;
- 13 3. Declare that Petitioner's detention without an individualized determination violates the  
14 Due Process Clause of the Fifth Amendment;
- 15 4. Issue a Writ of Habeas Corpus ordering the Respondents to release Petitioner from  
16 custody; hold a hearing if warranted, determine that Petitioners' detention is not  
17 justified because the government has not established by clear and convincing  
18 evidence that Petitioner presents a risk of flight or a danger to the community in  
19 light of the available alternatives;
- 20 5. Issue an Order prohibiting the Respondents from transferring Petitioner from the  
21 district without the court's approval;
- 22 6. Declare that Petitioner's continued detention is unconstitutional and unlawful because  
23 it is not reasonably related to any legitimate purpose of immigration detention;
- 24 7. In the alternative, should the Court determine that immediate release is not warranted,  
25 order Respondents to provide Petitioner with an individualized  
26 bond hearing before an impartial immigration judge within fourteen (14) days, at  
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DATED: April 24, 2026

ADAM GORDON  
United States Attorney

s/Michael D. Wallace  
MICHAEL D. WALLACE  
Assistant U.S. Attorney  
Attorneys for Respondents

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures of the United States District Court for the Southern District of California, I hereby certify that the content of this document is acceptable to Kara Hartzler, counsel for Petitioner, and that I have obtained authorization to affix her electronic signature to this document.

DATED: April 24, 2026

s/Michael D. Wallace  
MICHAEL D. WALLACE  
Assistant United States Attorney