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11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**
13

14 SARABJEET SINGH (A# 
15 Petitioner,
16 v.
17 WARDEN, IMPERIAL REGIONAL
18 DETENTION FACILITY, ET AL.
19 Respondents.

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

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

1 **PETITIONER’S REPLY IN SUPPORT OF EX PARTE APPLICATION FO**
2 **TEMPORARY RESTRAINING ORDER AND PRELIMINARY**
3 **INJUNCTION**

4 Petitioner Sarabjeet Singh (“Mr. Sarabjeet Singh”), by and through his counsel
5 of record Ramanujan Nadadur, respectfully submits the attached: (1) Reply In Support
6 of Ex Parte Application for Temporary Restraining Order and Preliminary Injunction;
7 (2) Declaration of Ramanujan Nadadur; and (3) Exhibit.

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9 Respectfully submitted,

10 DATED: March 13, 2026

11 By /s/ Ramanujan Nadadur

12 Ramanujan Nadadur
13 Co-Counsel for Petitioner
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1 **I. INTRODUCTION AND FACTUAL BACKGROUND**

2 On March 2, 2026, Petitioner Sarabjeet Singh (“Mr. Sarabjeet Singh”) filed a
3 Petition for Writ of Habeas Corpus, seeking immediate release from custody or
4 alternatively a bond hearing before a neutral arbiter, following his re-arrest by
5 Respondents in February of 2026. (Dkt. 1.) Mr. Sarabjeet Singh also filed an Ex Parte
6 Application for Temporary Restraining Order (“TRO”), seeking the same relief on a
7 temporary basis while his habeas petition is adjudicated before this Court. (Dkt. 2-1.)
8 Mr. Sarabjeet Singh was previously released on a bond of \$10,000, as ordered by the
9 Executive Office of Immigration Review (“EOIR”) in 2019. (Dkt. 1-2 at 8.)

10 On March 3, 2026, this Court issued a briefing schedule on the TRO, ordering
11 Respondents to file a Response by March 11, 2026, and Petitioner to file a Reply by
12 March 17, 2026. (Dkt. 4.) Following the Court’s order, the parties met and conferred
13 and decided that they would stipulate in part to the relief sought in the Ex Parte
14 Application for TRO and that further briefing was not necessary. (Dkt. 5.) Petitioner’s
15 position remains that Mr. Sarabjeet Singh was re-arrested in violation of his due
16 process rights because he was ordered released by EOIR and he was not provided
17 notice or an opportunity to be heard prior to his re-arrest. Petitioner’s position is that
18 the appropriate remedy for this violation is an immediate release on the same
19 conditions as existed before. (Dkt. 1 at ¶¶ 25-26; Dkt 2-1 at 4-8.) However, Petitioner’s
20 position is also that if the immigration court conducts an impartial bond hearing and
21 orders Petitioner released on the same conditions as existed before, this would moot the
22 emergency relief sought in the temporary restraining order.

23 Following the filing of the joint status report, Petitioner, through counsel, filed a
24 request for a bond hearing before EOIR and provided to the immigration court a copy
25 of the status report reflecting the parties’ agreement. (Declaration of Ramanujan
26 Nadadur at ¶ 2.) Petitioner’s counsel also conferred with government counsel regarding
27 the scheduling of the bond hearing. (Declaration of Ramanujan Nadadur at ¶ 3.) Lastly,
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1 Petitioner's counsel filed with the immigration court evidence regarding Mr. Sarabjeet
2 Singh's prior release in 2019; the fact that he did not violate the terms of his release
3 afterwards; his family connections to the United States; and his lack of criminal history.
4 (Declaration of Ramanujan Nadadur at ¶¶ 2, 5.) A copy of the docket on the bond
5 proceeding is attached to this brief as an exhibit. (Declaration of Ramanujan Nadadur at
6 ¶ 5, Ex. A.)

7 The immigration court scheduled the bond hearing for March 13, 2026.
8 (Declaration of Ramanujan Nadadur at ¶ 4.) After scheduling the hearing, on March 13,
9 2026, the immigration court denied Mr. Sarabjeet Singh bond for lack of jurisdiction
10 and refused to conduct the bond hearing. (Declaration of Ramanujan Nadadur at ¶ 4.)

11 II. ARGUMENT

12 The immigration court in this case must follow the *Maldonado Bautista*
13 judgment, as formalized through the agreement of the parties.¹ Unfortunately, Mr.
14 Sarabjeet Singh's case is not the first time that EOIR and Respondents are declining to
15 follow the judgment of a federal district court. As the court observed in *Maldonado*
16 *Bautista*, "Respondents' noncompliance with the Final Judgment has taken a toll on
17 wrongfully detained noncitizens, courts, and government and Petitioners' attorneys."
18 *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, 2026 WL 468284, at *4 (C.D.
19 Cal. Feb. 18, 2026).

20 In this case, Petitioner was released by EOIR in 2019, and neither EOIR nor the
21 Respondents have cited to any evidence that circumstances have changed since his last
22 release, thus necessitating his re-detention. Moreover, Petitioner and his counsel have
23 expended significant effort seeking to meet and confer with opposing counsel and then

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25 ¹ Although the *Bautista* decision is presently on appeal, the Ninth Circuit has not
26 yet ruled on the appeal. See *Bautista, et al. v. United States Department of Homeland*
27 *Security, et al.*, 25-7958 (9th Cir.)

DECLARATION OF RAMANUJAN NADADUR

I, Ramanujan Nadadur, declare:

1. I am licensed to practice law in the State of California, and I am admitted to practice in this Court. I am counsel to Mr. Sarabjeet Singh.

2. During the week of March 9, 2026, following the parties' agreement in this case, I requested a bond hearing before EOIR. I filed a formal request for a bond hearing, and I called the immigration court in Imperial, CA several times to ensure that my filings and evidence were being properly uploaded to the immigration court system. I provided the immigration court with a copy of the docket in this matter, the order setting a briefing schedule, and the joint status report filed by the parties. I also provided to the immigration court evidence regarding my client's prior release from custody; his family connections to the United States; and his lack of criminal history.

3. On March 11, 2026, I emailed AUSA Juliet Keene regarding the scheduling of the bond hearing. I stated in my email as follows: "I have attempted to enter my appearance and file for bond, and while the immigration court initially accepted my request and even scheduled me, the case now appears as a 'paper filing' case with no new date set for the bond hearing. Can you check with Respondents? Normally when a TRO is granted, the EOIR automatically schedules me, but it may be that they did not schedule it due to our agreement. I want to avoid filing anything additional in the federal court case, and just do this as a bond case before EOIR. Screenshot of what I see when I try to access his bond case: ."

4. The immigration court subsequently scheduled me for a bond hearing on March 13, 2026 at 1:00 PM. I assumed that this meant that we were proceeding on that day. On March 13, 2026, however, the judge declined to conduct a bond hearing on jurisdictional grounds.

5. Attached to this declaration as Exhibit A is a true and correct copy of the docket in the bond matter before the immigration court. This docket reflects that a bond

1 hearing was scheduled for March 13, 2026 and that I filed evidence regarding my
2 client's eligibility for bond.

3 I declare under penalty of perjury under the laws of the United States of America
4 that the foregoing is true and correct.

5 Executed on March 13, 2026, at Los Angeles, California.

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/s/ Ramanujan Nadadur
Ramanujan Nadadur

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Exhibit A

[Back to Cases](#)

A-Number  SINGH, SARABJEET

Select a case to view details and file documents

Removal	Charging Doc. Date 11/29/2018	Case Pending
Bond	Charging Doc. Date 11/29/2018 Bond Request Date 01/08/2019	Case Completed
Bond	Charging Doc. Date N/A - Bond Request Date 03/06/2026	Case Pending

End of list. Please file a Form EOIR 27 or EOIR 28 using "Appearances" link in the header to view additional cases

Court Information

Case Type	Bond		
Bond Request Date	03/06/2026		
Alien Name	SINGH, SARABJEET		
Hearing Location:	2409 LA BRUCHERIE ROAD IMPERIAL, CA 92251	Immigrati on Court:	2409 LA BRUCHERIE ROAD IMPERIAL, CA 92251
Next Bond Hearing:	03/13/2026 01:00 PM - 01:30 PM CUSTODY HEARING Zander, Stuart J	IJ Decision Date:	- NA - - - This bond is pending
Hearing Medium	Internet Based		

Court Actions

eROP Documents

Document Filters: View All Filter at the Court Filter at the BIA

Actions	Document Type	Filed Date	Filed At	Filed By	Document Status
	Evidence	03/13/2026	Court	Respondent Rep	Accepted
	Evidence	03/13/2026	Court	Respondent Rep	Accepted
	CASE Notice	03/12/2026	Court	OCU	Accepted
	Other Motion	03/12/2026	Court	Respondent Rep	Accepted
	Order - Motion for Continuance (MCon)	03/09/2026	Court	OCU	Accepted
	Pre-NTA Bond Redetermination Request	03/06/2026	Court	Respondent	Accepted
	EOIR 28, Notice of Entry of Appearance as an Attorney or Representative before the Immigration Court	03/06/2026	Court	Respondent Rep	Accepted
	Hearing Notice	03/06/2026	Court	OCU	Accepted
	Evidence	03/06/2026	Court	Respondent Rep	Accepted
	Evidence Part 01	03/06/2026	Court	Respondent Rep	Accepted
					Total Count: 18