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DETAINED

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF ARIZONA**

10 AZITA BADRI, an individual,

Case No.:

11 Petitioner,

**PETITION FOR WRIT OF HABEAS
CORPUS (28 U.S.C. § 2241, ALIEN
DETAINEE); AND**

12 v.

Agency file no.: A 

14 TODD M. LYONS, Acting Director, U.S.
15 Immigration and Customs Enforcement;
16 MARCOS CHARLES, Acting Executive
17 Associate Director, Enforcement and
18 Removal Operations, U.S. Immigration
19 and Customs Enforcement;
20 MARKWAYNE MULLIN, Secretary,
21 U.S. Department of Homeland Security;
22 PAMELA BONDI, U.S. Attorney
23 General; and DOE 1, Warden of Eloy
24 Detention Center,

Respondents.

1 **TO THE HONORABLE COURT AND TO THE PARTIES AND THEIR**
2 **COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** that Petitioner AZITA BADRI (“Petitioner”), A-
4 Number  by and through her attorneys hereby petitions the Court for a
5 Writ of Habeas Corpus, pursuant to Art. I, § 9, cl. 2 of the United States
6 Constitution; 28 U.S.C. § 2241; 28 U.S.C. § 1331; and 28 U.S.C. § 1651; and 28
7 U.S.C. §§2201, 2202, and for a directive to Respondents (1) to *immediately release*
8 Ms. Badri from Respondents’ detention at Eloy Detention Center, 1705 East Hanna
9 Road, Eloy, Arizona 85131 under appropriate supervision, if any; or, in the
10 alternative, (2) to provide a bond hearing within seven (7) days at which hearing (a)
11 the jurisdiction of the Immigration Judge to grant bond shall be deemed established,
12 (b) the government shall bear the burden of proof, (c) the standard is clear and
13 convincing evidence, and (d) the Immigration Judge must consider ability to pay
14 and alternatives to detention; (3) Prohibit re-detention absent genuine, documented
15 changed circumstances establishing significant likelihood of removal; and (4)
16 granting any other further relief as the Court may deem just and appropriate.
17

18 Petitioner also requests (5) that a Temporary Restraining Order issue
19 granting the same relief for the purpose of preserving the status quo ante; or, in the
20 alternative, (6) that the Court issue an order to show cause why a preliminary
21 injunction should not issue granting such relief pending a resolution of the entire
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petition.

*Petitioner requests that the Court immediately issue a provisional order that, while this matter is pending. Respondents shall not transfer Petitioner outside of the District of Arizona, for the purpose of preserving the status quo and this Court's jurisdiction pending adjudication.

INTRODUCTION

1. Petitioner Azita Badri (A ) seeks a writ of habeas corpus ordering her immediate release from unlawful immigration detention pursuant to 28 U.S.C. § 2241. Her detention post-final-removal order violates the Due Process Clause of the Fifth Amendment, the Ninth Circuit's decision in *Rodriguez v. Robbins*, 804 F13d 1060 (9th Cir. 2015), and federal statutes and INA regulations.

CUSTODY

2. Petitioner is currently detained under the authority of ICE at the Eloy Detention Center, 1705 East Hanna Road, Eloy, Arizona 85131. Petitioner is in the physical custody and under the direct control of Respondents.

JURISDICTION AND VENUE

3. This Court has jurisdiction under 28 U.S.C. § 2241(c)(3) because Petitioner is in custody in violation of the Constitution and laws of the United States.

4. Venue is proper in the District of Arizona pursuant to 28 U.S.C. §§

1391 and 2242 because Petitioner is detained within this District.

PARTIES

5. Petitioner, Azita Badri, originally of the Islamic Republic of Iran, is a noncitizen currently detained by Respondents at Eloy Detention Center, 1705 East Hanna Road, Eloy, Arizona 85131. She has been in Respondents' custody most recently since on or around March 1, 2026.

6. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs Enforcement (ICE). He is a legal custodian of Petitioner and is named in his official capacity.

7. Respondent Marcos Charles is the Acting Executive Associate Director of Enforcement and Removal Operations for U.S. Immigration and Customs Enforcement (ICE). He is a legal custodian of Petitioner and is named in his official capacity.

8. Respondent Markwayne Mullin is the Secretary of the United States Department of Homeland Security (DHS). He is a legal custodian of Petitioner and is named in his official capacity.

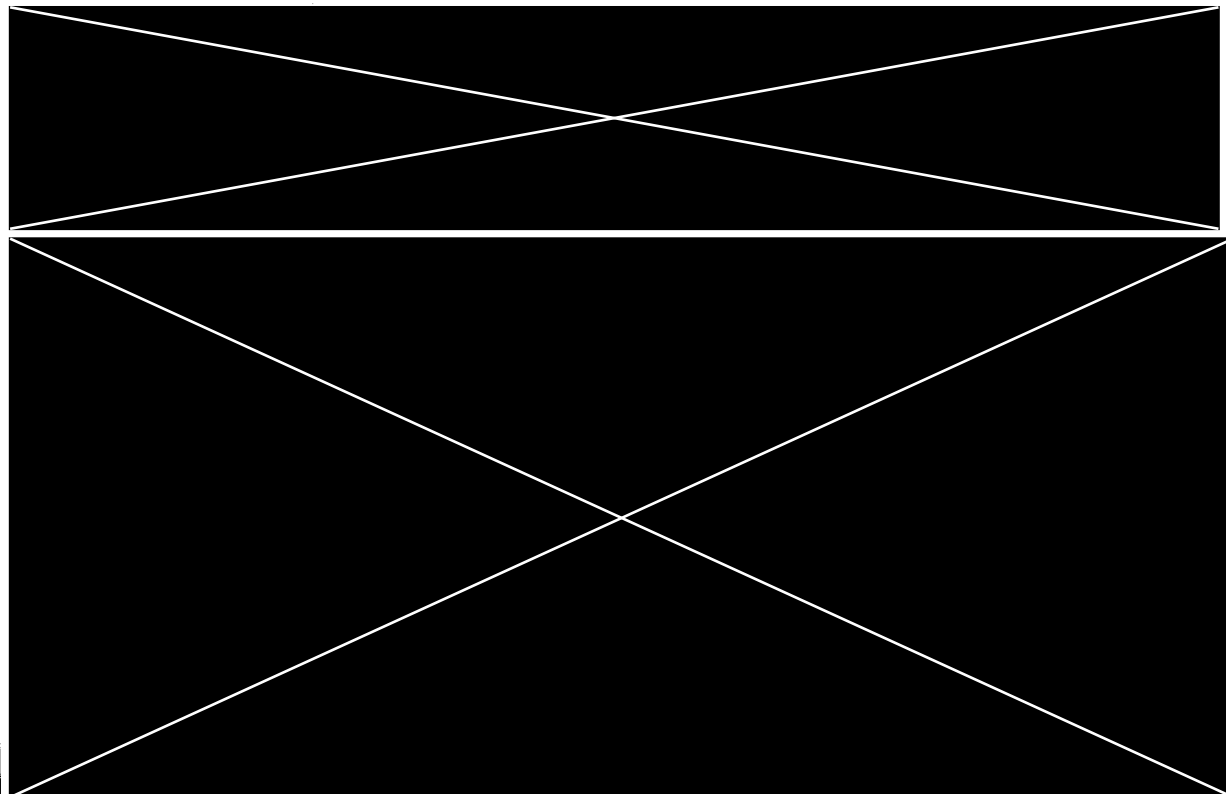
9. Respondent Pamela Jo Bondi is the Attorney General of the United States Department of Justice. She is a legal custodian of Petitioner and is named in her official capacity.

10. Respondent DOE 1 is the Warden of Eloy Detention Center, 1705 East

1 Hanna Road, Eloy, Arizona 85131, where Petitioner is currently detained. He is a
2 legal custodian of Petitioner and is named in his official capacity. Respondent DOE
3 1 is sued under said fictitious name given the unavailability of public information
4 regarding his or her identity. On information and belief, DOE 1 is believed to be
5 agent or employee of the other Respondents. Upon discovery of the identity of
6 Respondent DOE 1, Petitioner will seek leave to amend this Petition to provide the
7 correct name.
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10 **STATEMENT OF FACTS**

11 11. Petitioner Azita Badri (A ) is a citizen and native of the
12 Islamic Republic of Iran. 



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6 14. In June of 1995, Petitioner was able to leave Iran and enter the United
7 States on a student visa.

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9 15. On January 25, 2001, Petitioner was arrested and detained by INS. She
10 was placed in removal proceedings as a visa overstay. Petitioner was later released
11 on an order of supervision.

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13 16. Petitioner filed a Form I-589 with the Immigration Court. On October
14 25, 2004, the Immigration Judge – finding that Petitioner had not filed within 1
15 year of arrival – granted Petitioner withholding of removal to Iran under Part III of
16 the Convention Against Torture and ordered Petitioner removed to “any other
17 country which would accept, except Iran”. *See* Withholding Order, **Exhibit 1**.

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19 17. Since that time, Petitioner had been living a peaceful, productive,
20 lawful, and free life in the United States. Petitioner has a fixed address: 

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22  Petitioner has not committed any
23 crimes in the United States.

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25 18. Most recently, on March 1, 2026, Petitioner was getting out of an Uber
26 at Los Angeles International Airport – she was about to embark on a trip to
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1 Washington. However, agents of U.S. Immigration and Customs Enforcement were
2 present at the terminal waiting for Petitioner. They arrested Petitioner and took her
3 into custody. ICE eventually transported Petitioner to Eloy Detention Center, 1705
4 East Hanna Road, Eloy, Arizona 85131, where she remains detained as of the filing
5 of this petition.
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7 19. Petitioner was not shown an arrest warrant. She was not provided with
8 any substantive reasons why she was being re-detained. She was not advised of any
9 changed circumstances indicating that it was more than likely that she could be
10 removed in the reasonably foreseeable future, and she was not given an opportunity
11 to contest her detention.
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14 **IRREPARABLE INJURY**

15 20. Petitioner's unlawful arrest and confinement inflict irreparable harm
16 that cannot be remedied by later judicial review. Every day of unlawful detention is
17 an ongoing constitutional violation, which is in itself an irreparable injury. *See, e.g.,*
18 *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (Concerning the
19 preliminary injunction inquiry, "[i]t is well established that the deprivation of
20 constitutional rights 'unquestionably constitutes irreparable injury.'")
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23 21. Petitioner's detention deprives her of emotional and financial support,
24 inflicting harm that monetary damages cannot repair. *See Leiva-Perez v. Holder*,
25 640 F.3d 962, 968 (9th Cir. 2011).
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1 22. Lastly, prolonged detention without cause has caused escalating
2 anxiety, depression, and sleep disturbance for Petitioner. Courts recognize that even
3 short-term civil detention can cause lasting psychological trauma.

4 23. Because these harms are immediate, ongoing, and not compensable by
5 money damages, the Court's intervention is necessary to prevent continuing and
6 irreparable injury to Petitioner.
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8 **EXHAUSTION OF REMEDIES**

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10 24. The Ninth Circuit has consistently held that exhaustion is not required
11 where administrative remedies are inadequate, futile, or unavailable, particularly in
12 immigration habeas cases. *Singh v. Holder*, 638 F.3d 1196, 1203 FN. 3 (9th Cir.
13 2011); *Puga v. Chertoff*, 488 F.3d 812, 815 (9th Cir. 2007); *see also Hernandez v.*
14 *Sessions*, 872 F.3d 976, 988-989 (9th Cir. 2017) (permitting habeas review of
15 custody without requiring exhaustion). Accordingly, Petitioner properly seeks relief
16 in this Court because there exists no adequate administrative forum to contest her
17 unlawful arrest and confinement, and continued detention constitutes an ongoing
18 violation of constitutional rights.
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22 **THE DETENTION IS UNLAWFUL**

23 **I. CLAIM ONE: PETITIONER'S DETENTION VIOLATES DUE** 24 **PROCESS AND MANDATORY REGULATIONS** 25

26 25. "The Due Process Clause of the Fifth Amendment prohibits the
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1 Government from depriving individuals of their life, liberty, or property, without
2 due process of law.” *Hernandez v. Sessions*, 872 F.3d 976, 990 (9th Cir. 2017).
3 “[T]he Due Process Clause applies to all persons within the United States,
4 including aliens, whether their presence is lawful, unlawful, temporary, or
5 permanent.” *Zadvydas v. Davis*, 533 U.S. 678, 679 (2001). “Freedom from
6 imprisonment—from government custody, detention, or other forms of physical
7 restraint—lies at the heart of the liberty that Clause protects.” *Id.* at 690. A person
8 at risk of a suffering a serious loss being given notice and an opportunity to be
9 heard, in a meaningful manner and at a meaningful time, is the essence of
10 procedural due process. *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976).

14 26. Petitioner’s re-detention violates both the Due Process Clause and
15 binding agency regulations that strictly govern the revocation of release for
16 noncitizens previously determined not to be removable in the reasonably
17 foreseeable future. Under 8 C.F.R. § 241.13(i), once a noncitizen has been released
18 under an order of supervision due to the unlikelihood of removal, ICE may re-
19 detain that individual only under narrowly defined circumstances and only by
20 following specific procedural safeguards. These safeguards are not discretionary.
21 They require that the agency provide notice of the reasons for revocation, identify
22 the factual basis for any alleged “changed circumstances,” and afford the noncitizen
23 a prompt and meaningful opportunity to respond.
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1 27. The Supreme Court has long held that agencies are bound to follow
2 their own regulations where those regulations are intended to protect individual
3 rights. See *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260 (1954). The
4 Ninth Circuit has consistently applied this principle in the immigration context,
5 recognizing that failure to adhere to governing regulations may invalidate agency
6 action and constitute a due process violation. See, e.g., *Montilla v. INS*, 926 F.2d
7 162, 166–69 (2d Cir. 1991) (widely cited and applied in Ninth Circuit
8
9 jurisprudence); *Sanchez v. Sessions*, 870 F.3d 901, 910 (9th Cir. 2017) (recognizing
10 due process protections in immigration proceedings).
11

12 28. Here, ICE wholly failed to comply with § 241.13(i). Petitioner was not
13 provided with any notice—let alone adequate notice—of the reasons for revocation
14 of her release. She was not informed of any alleged “changed circumstances,” nor
15 was she given any opportunity to present evidence or argument in response. This
16 complete absence of process violates both the regulation and constitutional due
17 process requirements.
18

19 29. Courts within the Ninth Circuit have repeatedly held that even
20 minimal or generic notice is insufficient under § 241.13(i). As the attached district
21 court order explains, boilerplate statements asserting “changed circumstances” or a
22 “significant likelihood of removal” without supporting factual detail fail to satisfy
23 the regulation because they prevent the noncitizen from meaningfully responding.
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1 In this case, ICE provided no explanation at all, rendering the violation even more
2 pronounced.

3 30. Moreover, due process requires that deprivations of liberty be
4 preceded by notice and an opportunity to be heard “at a meaningful time and in a
5 meaningful manner.” *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). Immigration
6 detention, while civil in nature, nonetheless implicates fundamental liberty
7 interests. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). ICE’s failure to provide
8 any procedural safeguards before or after re-detaining Petitioner falls far short of
9 these constitutional requirements.
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12 31. Because ICE failed to follow mandatory regulatory procedures and
13 denied Petitioner basic due process, her detention is unlawful and must be
14 terminated.
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17 **II. CLAIM TWO: RESPONDENTS HAVE NOT ESTABLISHED**
18 **“CHANGED CIRCUMSTANCES” OR A SIGNIFICANT**
19 **LIKELIHOOD OF REMOVAL**
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21 32. Even if ICE had complied with procedural requirements—which it did
22 not—Petitioner’s re-detention would still be unlawful because the agency has not
23 established the substantive prerequisites for revocation of release under 8 C.F.R. §
24 241.13(i)(2). That regulation permits re-detention only where “changed
25 circumstances” demonstrate that there is now a “significant likelihood” that the
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1 noncitizen will be removed in the reasonably foreseeable future.

2 33. This standard imposes a meaningful evidentiary burden on the
3 government. It is not sufficient for ICE to assert, in conclusory fashion, that
4 removal may occur at some unspecified time. Rather, the agency must identify
5 concrete, individualized facts demonstrating that removal is realistically attainable
6 in the near future. As courts have explained, the regulation requires consideration
7 of multiple factors, including the government's historical success in removing
8 similarly situated individuals, the status of diplomatic relations with the receiving
9 country, and the likelihood that travel documents will be issued.
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12 34. The attached district court order is directly on point. There, the court
13 rejected ICE's reliance on generalized assertions and speculative expectations
14 regarding removal, holding that such evidence is insufficient to establish a
15 "significant likelihood" of removal. The court emphasized that even a pending
16 request for travel documents does not satisfy the government's burden absent
17 concrete evidence that removal will actually occur.
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20 35. Here, ICE has not identified any changed circumstances whatsoever.
21 Petitioner remains subject to a withholding of removal order that prohibits her
22 removal to Iran. ICE has not identified any third country willing to accept her, nor
23 has it produced any evidence of travel documents, diplomatic arrangements, or
24 removal logistics. There is no indication that her circumstances differ in any
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1 material way from the decades during which she was previously deemed not
2 removable in the reasonably foreseeable future.

3 36. Ninth Circuit precedent reinforces that detention cannot be justified by
4 speculative or hypothetical removal possibilities. In *Prieto-Romero v. Clark*, the
5 court upheld detention only because removal was concretely tied to a pending
6 appeal and thus reasonably foreseeable. 534 F.3d 1053, 1060–63 (9th Cir. 2008).
7 By contrast, where removal depends on uncertain future events or the discretionary
8 actions of foreign governments, courts have consistently found that continued
9 detention is not justified.
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12 37. Because ICE has failed to identify any changed circumstances or
13 provide evidence demonstrating a realistic likelihood of removal, Petitioner's re-
14 detention violates § 241.13(i)(2) and must be set aside.
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17 **III. CLAIM THREE: PETITIONER'S DETENTION IS INDEFINITE AND**
18 **UNLAWFUL UNDER *ZADVYDAS***

19 38. Petitioner's continued detention also violates the constitutional
20 limitations articulated in *Zadvydas v. Davis*, which construed 8 U.S.C. § 1231(a)(6)
21 to avoid serious due process concerns. The Supreme Court held that post-removal-
22 order detention is limited to a period reasonably necessary to effectuate removal
23 and that, once removal is no longer reasonably foreseeable, continued detention is
24 not authorized. 533 U.S. at 689.
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1 39. The Court established a presumptively reasonable six-month period of
2 detention, after which the noncitizen may obtain release by demonstrating that there
3 is “no significant likelihood of removal in the reasonably foreseeable future.” *Id.* at
4 701. Once that showing is made, the burden shifts to the government to rebut it
5 with sufficient evidence. *Id.*

7 40. The Ninth Circuit has faithfully applied *Zadvydas* and has emphasized
8 that detention must be tied to a realistic prospect of removal. See *Diouf v.*
9 *Napolitano*, 634 F.3d 1081, 1086–87 (9th Cir. 2011) (recognizing constitutional
10 limits on prolonged detention under § 1231(a)(6)); *Prieto-Romero*, 534 F.3d at
11 1062 (detention permissible only where removal is reasonably foreseeable). Where
12 removal is speculative or dependent on uncertain future events, continued detention
13 becomes unconstitutional.

14 41. In this case, Petitioner has demonstrated that there is no significant
15 likelihood of removal in the reasonably foreseeable future. She cannot be removed
16 to Iran due to her withholding of removal protection. ICE has not identified any
17 alternative country of removal, nor has it provided evidence of any ongoing efforts
18 that are likely to succeed.

19 42. The circumstances here present precisely the type of indefinite
20 detention that *Zadvydas* prohibits. Allowing ICE to detain Petitioner indefinitely—
21 without a viable removal pathway and without meaningful procedural safeguards—
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1 would effectively nullify the constitutional limitations recognized by the Supreme
2 Court.

3 43. Courts confronting similar circumstances have consistently ordered
4 release. As reflected in the attached order, where the government cannot
5 demonstrate a concrete and realistic likelihood of removal, continued detention is
6 unlawful and must be terminated.
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8 44. Accordingly, Petitioner's detention exceeds the limits imposed by §
9 1231(a)(6) as construed by *Zadvydas* and violates the Due Process Clause.
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11 **THE BALANCE OF EQUITIES AND PUBLIC INTEREST WEIGH IN**
12 **PETITIONER'S FAVOR**
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14 45. The balance of equities tips sharply in Petitioner's favor, and the
15 public interest strongly supports granting immediate injunctive relief. In evaluating
16 these factors, courts in the Ninth Circuit recognize that they merge when the
17 government is a party. *See Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092
18 (9th Cir. 2014). Accordingly, the Court may consider these factors together.
19

20 46. Petitioner's interest in freedom from unlawful detention is of the
21 highest order. The Ninth Circuit has repeatedly emphasized that even brief
22 deprivations of physical liberty constitute irreparable harm and weigh heavily in
23 favor of injunctive relief. *See Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir.
24 2012). That principle carries particular force in the immigration detention context,
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1 where individuals are confined without the protections afforded in criminal
2 proceedings.

3 47. Here, Petitioner has lived peacefully in the community for decades
4 under an order of supervision, has no criminal history, and has fully complied with
5 all immigration requirements. Her sudden re-detention—without notice,
6 explanation, or legal justification—has resulted in a severe and ongoing deprivation
7 of liberty. The harm to Petitioner is concrete, immediate, and irreparable.
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9 48. By contrast, Respondents have no legitimate interest in continuing
10 unlawful detention. The government “cannot suffer harm from an injunction that
11 merely ends an unlawful practice.” *Rodriguez v. Robbins*, 715 F.3d 1127, 1145 (9th
12 Cir. 2013), rev’d on other grounds, *Jennings v. Rodriguez*, 583 U.S. 281 (2018).
13 Where detention violates statutory and constitutional limits, continued custody
14 serves no lawful governmental purpose.
15

16 49. Moreover, Petitioner’s long history of compliance under supervision
17 demonstrates that her release would not undermine any legitimate enforcement
18 interests. Courts in this District and throughout the Ninth Circuit routinely order
19 release under similar circumstances where individuals have demonstrated
20 compliance and lack of danger. See, e.g., *Khader v. Holder*, 843 F.Supp.2d 1202,
21 1210 (D. Ariz. 2011).
22

23 50. The public interest likewise favors granting relief. The Ninth Circuit
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1 has consistently recognized that the public interest is served by ensuring that
2 government actors comply with the Constitution and governing statutes. *See Ariz.*
3 *Dream Act Coal. v. Brewer*, 757 F.3d 1053, 1069 (9th Cir. 2014). Upholding the
4 rule of law and preventing unlawful detention are core public interests of the
5 highest importance.
6

7 51. Additionally, the public has a strong interest in the fair and lawful
8 administration of the immigration system. Detaining individuals without following
9 mandatory regulations or providing due process undermines confidence in that
10 system and contravenes fundamental principles of justice.
11

12 52. Because Petitioner faces severe and ongoing harm, and because the
13 government has no legitimate interest in maintaining unlawful detention, the
14 balance of equities and the public interest overwhelmingly favor granting a
15 temporary restraining order and ordering Petitioner's immediate release.
16
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18 **A TEMPORARY RESTRAINING ORDER SHOULD ISSUE**

19 53. A temporary restraining order is an "extraordinary remedy that may
20 only be awarded upon a clear showing that the plaintiff is entitled to such relief."
21 *Winter v. Nat. Res. Def. Council*, 555 U.S. 7, 22 (2008). The standard for issuing a
22 temporary restraining order is "substantially identical" to that for issuing a
23 preliminary injunction. *Stuhlbarg Int'l Sales Co. v. John D. Brush & Co.*, 240 F.3d
24 832, 839 n.7 (9th Cir. 2001). Pursuant to Federal Rule of Civil Procedure ("Rule")
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1 65, a court may grant preliminary injunctive relief to prevent “immediate and
2 irreparable injury.” Fed. R. Civ. P. 65(b). A party seeking a preliminary injunction
3 must establish that: (1) he is likely to succeed on the merits; (2) he is likely to suffer
4 irreparable harm in the absence of preliminary relief; (3) the balance of the equities
5 tips in his favor; and (4) an injunction is in the public interest. *See Toyo Tire*
6 *Holdings of Ams. Inc. v. Cont’l Tire N. Am., Inc.*, 609 F.3d 975, 982 (9th Cir. 2010)
7 (citing *Winter*, 555 U.S. at 20).
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10 54. Petitioner satisfies these standards. She is highly likely to succeed on
11 the merits because ICE failed to follow mandatory regulations and has not
12 demonstrated any lawful basis for her detention. Courts across the Ninth Circuit
13 have repeatedly granted habeas relief in materially indistinguishable circumstances.
14

15 55. Petitioner is suffering ongoing irreparable harm because unlawful
16 detention constitutes a severe deprivation of liberty. The Ninth Circuit has long
17 recognized that loss of liberty, even for minimal periods, constitutes irreparable
18 injury.
19

20 56. The balance of equities strongly favors Petitioner. She has lived
21 peacefully under supervision for decades, has no criminal history, and poses no risk
22 of flight or danger. By contrast, Respondents have no legitimate interest in
23 continuing unlawful detention.
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26 57. Finally, the public interest favors compliance with constitutional and
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1 statutory limits on detention. Ensuring that government agencies adhere to their
2 own regulations and do not impose unlawful detention serves fundamental rule-of-
3 law principles.

4
5 58. For these reasons, the Court should issue a temporary restraining order
6 directing Respondents to immediately release Petitioner under appropriate
7 conditions.

8
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Petitioner AZITA BADRI respectfully requests that the Court
11 grant the following relief:

- 12
13 1. Issue a Writ of Habeas Corpus and directive to Respondents to
14 immediately release Petitioner under appropriate supervision; or, in the
15 alternative,
16
17 2. Order Respondents to provide a bond hearing within seven (7) days at
18 which:
19 a. The jurisdiction of the Immigration Judge to hear the
20 request for bond shall be deemed established;
21
22 b. The Government shall bear the burden of proof;
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24 c. The standard is clear and convincing evidence; and
25
26 d. The Immigration Judge must consider ability to pay and
27 alternatives to detention;
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1 3. Prohibit re-detention absent genuine, documented changed
2 circumstances establishing significant likelihood of removal; and

3 4. Grant any other further relief as the Court may deem just and
4 appropriate.
5

6 Petitioner AZITA BADRI also respectfully requests that the Court grant the
7 following preliminary injunctive relief on an expedited basis:
8

9 5. Issue a Temporary Restraining Order and directive to Respondents to
10 immediately release Petitioner under appropriate supervision and
11 Prohibiting Respondents from attempting to re-detain or to remove
12 Petitioner from the United States, so as to preserve the *status quo ante*;
13 or, in the alternative,
14

15 6. Order Respondents to provide a bond hearing within seven (7) days at
16 which:
17

18 a. The jurisdiction of the Immigration Judge to hear the
19 request for bond shall be deemed established;

20 b. The Government shall bear the burden of proof;

21 c. The standard is clear and convincing evidence; and
22

23 d. The Immigration Judge must consider ability to pay and
24 alternatives to detention;
25

26 7. Prohibit re-detention absent genuine, documented changed
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1 circumstances establishing significant likelihood of removal; and

2 8. Grant any other further relief as the Court may deem just and
3 appropriate.

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5 9. In the alternative, set an order to show cause why a preliminary
6 injunction should not issue granted the relief just described.

7
8 Respectfully submitted,

9 Dated March 24, 2026.

10
11 /s/ [Steven Ridgill]

12 Steven Ridgill, SBN 338535
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16 (213) 680-7801
17 steven@judy-wood.com
18 *Attorney for Petitioner*
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EXHIBITS

- 1.
- Withholding Order

VERIFICATION

This petition cannot be immediately verified by AZITA BADRI because she is in Respondents' custody. Consequently, counsel of the Petitioner, hereby verifies, based on information and belief obtained from information received from Petitioner that the factual information in this petition is true and correct.

SWORN under the penalty of perjury of the laws of the United States this date of March 24, 2026, at Los Angeles, California.

/s/ [Steven K. Ridgill]

Steven Ridgill

Attorney for Petitioner Azita Badri

CERTIFICATE OF WORD COUNT

The undersigned, counsel of record for Petitioner, certifies that the preceding
Petition for Writ of Habeas Corpus and Request for Temporary Restraining Order
contains 3,895 words.

Certified this date of March 24, 2026, at Los Angeles, California.

/s/ [Steven K. Ridgill]

Steven K. Ridgill, attorney for
Petitioner