

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL ACTION**

SARDOR ILGORJON UGLI TUKHTAEV,

Petitioner,

Case No. _____

v.

WARDEN OF DETENTION FACILITY, et al.,

Respondents.

**PETITIONER'S EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Petitioner Sardor Ilgorjon Ugli Tukhtaev (“Petitioner”), by and through undersigned counsel, Jonathan J. Sobel, Esquire, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 65 for an emergency temporary restraining order and preliminary injunction.

Petitioner is a native and citizen of Uzbekistan currently detained by ICE under the jurisdiction of the Philadelphia, PA ERO Docket Control Office. Following the BIA’s decisions in *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), and *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), ICE reclassified Petitioner from 8 U.S.C. § 1226(a) to § 1225(b)(2), stripping his bond eligibility and subjecting him to mandatory detention.

Emergency relief is warranted because Petitioner faces irreparable harm from continued unlawful detention. The deprivation of physical liberty constitutes irreparable injury per se. See *Elrod v. Burns*, 427 U.S. 347, 373 (1976). Each day of continued detention without a bond hearing compounds the irreparable injury to Petitioner’s liberty interest.

The four-factor test for a temporary restraining order is met: (1) Petitioner is likely to succeed on the merits because the statutory text, the 1997 Rule, and over 300 federal courts support his position; (2) Petitioner will suffer irreparable harm absent injunctive relief; (3) the balance of equities favors Petitioner because the government has no legitimate interest in unlawful detention; and (4) an injunction serves the public interest by vindicating constitutional rights.

WHEREFORE, Petitioner respectfully requests that this Court: (a) issue a temporary restraining order requiring Petitioner’s immediate release from custody; (b) schedule a hearing on a preliminary injunction; (c) enjoin Respondents from transferring Petitioner from this district pending resolution; and (d) grant such other relief as this Court deems just and proper.

A supporting Memorandum of Law is filed contemporaneously herewith.

Respectfully submitted,

/

/s/ Jonathan J. Sobel

JONATHAN J. SOBEL, ESQUIRE

Attorney I.D. No. 76428

Law Offices of Jonathan J. Sobel

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

Tel: (215) 735 7535

Email: mate89@aol.com

Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing Petitioner's Emergency Motion for Temporary Restraining Order and Preliminary Injunction was served upon the following by the means indicated:

VIA CM/ECF ELECTRONIC FILING:

All counsel of record who are registered CM/ECF users will be served by the Court's electronic filing system.

VIA UNITED STATES FIRST-CLASS MAIL:

United States Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

Warden
Detention Facility
[Address to be confirmed]

Field Office Director
Philadelphia ERO Field Office
1600 Callowhill Street
Philadelphia, PA 19130

Todd Lyons, Acting Director
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Markwayne Mullin, Secretary
U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528

Pamela Bondi, Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

/s/ Jonathan J. Sobel,
JONATHAN J. SOBEL, ESQUIRE

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
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SARDOR ILGORJON UGLI TUKHTAEV,

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Respondents.

**MEMORANDUM OF LAW IN SUPPORT OF
PETITIONER'S EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

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INTRODUCTION

Petitioner Sardor Ilgorjon Ugli Tukhtaev (“Petitioner”), by and through undersigned counsel, Jonathan J. Sobel, Esquire, respectfully submits this Memorandum in support of his Emergency Motion for a Temporary Restraining Order and Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65.

Petitioner is unlawfully detained by ICE following his reclassification from 8 U.S.C. § 1226(a) to § 1225(b)(2) pursuant to the BIA’s decisions in *Matter of Q. Li* and *Matter of Yajure Hurtado*. As set forth in the accompanying Petition and Memorandum of Law, this reclassification violates the INA, the Due Process Clause, and the APA. Emergency relief is necessary to prevent ongoing irreparable harm to Petitioner’s liberty.

LEGAL STANDARD

Under Rule 65, a temporary restraining order may issue where the movant demonstrates: (1) a likelihood of success on the merits; (2) irreparable harm absent injunctive relief; (3) the balance of equities tips in the movant’s favor; and (4) the injunction is in the public interest. *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008).

ARGUMENT

I. PETITIONER IS LIKELY TO SUCCEED ON THE MERITS

As fully briefed in the accompanying Memorandum of Law, Petitioner is likely to succeed on the merits because: (a) the plain text of the INA classifies individuals in Petitioner’s situation under § 1226(a); (b) the 1997 Rule (62 Fed. Reg. 10,323) confirms this classification; (c) the BIA’s decisions in *Q. Li* and *Yajure Hurtado* contradict the statutory text, the regulations, and have been rejected by over 300 federal courts; and (d) following *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024), this Court exercises independent judgment and owes no deference to the BIA’s interpretation.

Multiple federal courts in this circuit and beyond have granted habeas relief on identical facts. See *Toure v. Bondi*, No. 3:26-cv-00323 (M.D. Pa. Feb. 27, 2026) (granting habeas, ordering release); *Abdallahi v. Raycraft*, No. 1:26-cv-00456 (W.D. Mich. Mar. 4, 2026) (ordering bond hearing within 5 days).

II. PETITIONER WILL SUFFER IRREPARABLE HARM

The loss of physical liberty constitutes irreparable injury per se. *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (“[t]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury”). The Supreme Court has applied this principle with particular force in the detention context, recognizing that “[f]reedom 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).

Each day of Petitioner’s continued detention without a bond hearing compounds the irreparable injury. Monetary damages cannot compensate for the deprivation of physical liberty. Petitioner’s ongoing detention under an unlawful reclassification constitutes per se irreparable harm.

III. THE BALANCE OF EQUITIES FAVORS PETITIONER

The balance of equities overwhelmingly favors Petitioner. Petitioner has a fundamental liberty interest at stake, whereas the government has no legitimate interest in detaining individuals under an unlawful statutory classification. The government previously determined that Petitioner could be safely released under § 1226(a)—and he complied with all conditions. The only change is the BIA’s legal interpretation, which over 300 courts have rejected.

IV. THE PUBLIC INTEREST SUPPORTS INJUNCTIVE RELIEF

The public interest is always served by preventing the violation of constitutional rights. It is in the public interest that the government comply with the law and that individuals are not deprived of their liberty without due process of law.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Court issue a temporary restraining order requiring Petitioner's immediate release from custody, schedule a hearing on a preliminary injunction, and enjoin Respondents from transferring Petitioner from this district.

Respectfully submitted,

/s/ Jonathan J. Sobel

JONATHAN J. SOBEL, ESQUIRE

Attorney I.D. No. 76428

Law Offices of Jonathan J. Sobel

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

Tel: (215) 735 7535

Email: mate89@aolcom

Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing Memorandum of Law in Support of Petitioner's Emergency Motion for Temporary Restraining Order was served upon the following by the means indicated:

VIA CM/ECF ELECTRONIC FILING:

All counsel of record who are registered CM/ECF users will be served by the Court's electronic filing system.

VIA UNITED STATES FIRST-CLASS MAIL:

United States Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

J.L. JAMISON, Warden
700 Arch Street
Philadelphia, PA 19106

Field Office Director
Philadelphia ERO Field Office
1600 Callowhill Street
Philadelphia, PA 19130

Todd Lyons, Acting Director
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Markwayne Mullin, Secretary
U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528

Pamela Bondi, Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

/s/ Jonathan J. Sobel
JONATHAN J. SOBEL, ESQUIRE

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL ACTION**

SARDOR ILGORJON UGLI TUKHTAEV,

Petitioner,

Case No. _____

v.

J.L. JAMISON, WARDEN OF DETENTION FACILITY, et
al.,

Respondents.

[PROPOSED] TEMPORARY RESTRAINING ORDER

AND NOW, this _____ day of _____, 2026, upon consideration of Petitioner's
Emergency Motion for Temporary Restraining Order and Preliminary Injunction, and good cause
having been shown, it is hereby ORDERED as follows:

1. Petitioner's Emergency Motion for Temporary Restraining Order is GRANTED.
2. Respondents shall RELEASE Petitioner Sardor Ilgorjon Ugli Tukhtaev from custody forthwith, subject to reasonable conditions of supervision.
3. Respondents are TEMPORARILY RESTRAINED from detaining Petitioner under 8 U.S.C. § 1225(b)(2) or the authority of Matter of Q. Li, 29 I&N Dec. 66 (BIA 2025), or Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025).
4. Respondents are TEMPORARILY RESTRAINED from transferring Petitioner outside this judicial district.
5. A hearing on Petitioner's Motion for Preliminary Injunction shall be held on _____, 2026, at _____ a.m./p.m.
6. Respondents shall SHOW CAUSE why a preliminary injunction should not issue. Response is due within _____ days of this Order.
7. The Clerk of Court shall serve this Order on all parties via CM/ECF.

SO ORDERED.

United States District Judge

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Civil Action No. _____

SARDOR ILGORJON UGLI TUKHTAEV,

Petitioner,

v.

WARDEN OF DETENTION FACILITY, et al.,

Respondents.

**EXHIBIT PACKAGE IN SUPPORT OF PETITION FOR WRIT OF
HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241**

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EXHIBIT A

Notice to Appear (Form I-862)

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINS [REDACTED]

File No: [REDACTED]

DOB: [REDACTED]

Event No: [REDACTED]

In the Matter of:

SARDOR ILGORJON UGLI TUKHTAEV

Respondent:

currently residing at:

(Number, street, city, state and ZIP code)

(Area code and phone number)

- ☐ You are an arriving alien.
- ☒ You are an alien present in the United States who has not been admitted or paroled.
- ☐ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States.
2. You are a native of UZBEKISTAN and a citizen of UZBEKISTAN.
3. You arrived in the United States at or near TECATE, CA, on or about September 27, 2023.
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- ☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- ☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

900 MARKET STREET, SUITE 504 PHILADELPHIA PA 19107

(Complete Address of Immigration Court, including Room Number, if any)

on April 01, 2024 at 03:30 PM to show why you should not be removed from the United States based on the
(Date) (Time)

charge(s) set forth above.

(A) WATCH COMMANDER

ROGER A PRINDLE

Date: 2023.09.29 02:14:53 -07:00

0481350262 CBP

(Signature and Title of Issuing Officer) (Sign in ink)

Date: September 29, 2023

San Diego, California

(City and State)

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-8903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Upon information and belief, the language that the alien understands is **UZBEK, TAJIK, RUSSIAN, & KOREAN.**

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office of Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

Date:

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on 10/08/2025, in the following manner and in compliance with section 239(a)(1) of the Act.

☐ In person ☐ by certified mail, returned receipt # _____ requested ☒ by regular mail

☐ Attached is a credible fear worksheet.

☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the _____ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

(Signature of Respondent if Personally Served)

Rebecca Stafford LAS
(Signature and Title of Officer)

Philadelphia, Pennsylvania (Page 1)
Catholic Social Services, Archdiocese of Philadelphia*

Jewish Family
5743 Bartlett St.

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

EXHIBIT B

Order of Release on Recognizance (Form I-220A)

U.S. Department of Homeland Security

Order of Release on Recognizance

File No: [REDACTED]
 Date: September 28, 2023
 Event No: [REDACTED]

Name: SARDOR ILGORJON UGLI TUKHTAEV

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

☒ You must report for any hearing or interview as directed by the Department of Homeland Security or the Executive Office for Immigration Review.

☒ You must surrender for removal from the United States if so ordered.

☒ You must report in (~~writing~~) (person) to _____
 (Name and Title of Case Officer)
 at As indicated on the attached OREC G-56 on _____ at _____
 (Location of DHS Office) (Day of each week or month) (Time)

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

☒ You must not change your place of residence without first securing written permission from the immigration officer listed above.

☒ You must not violate any local, State, or Federal laws or ordinances.

☒ You must assist the Department of Homeland Security in obtaining any necessary travel documents.

☐ Other: _____

☐ See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by the Department of Homeland Security.

ROGER A PRINDLE
 Date: 2023.09.29 02:35:04 -07:00
 0481350262 CBP

(Signature of DHS Official)

(A) WATCH COMMANDER

(Printed Name and Title of Official)

Alien's Acknowledgment of Conditions of Release on Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the UZBEK language) and understand the conditions of my release as set forth in this order. I further understand that if I do not comply with these conditions, the Department of Homeland Security may revoke my release without further notice.

JOSEPH I. GARCIA

JOSEPH I. GARCIA
 Date: 2023.09.29 02:52:18 -07:00
 0034210429 CBP

(Signature of Immigration Officer Serving Order)

(Signature of Alien)

09/29/2023

(Date)

Cancellation of Order

I hereby cancel this order of release because: ☐ The alien failed to comply with the conditions of release.

☐ The alien was taken into custody for removal.

(Signature of Immigration Officer Cancelling Order)

(Date)

Form I-220A (Rev. 08/01/07) N

EXHIBIT C

A-File Jacket Starter (CBP Processing Record)

A-FILE JACKET STARTER

A-File Number

Subject ID:

CONTROL Name (Last, First, Middle) TUKHTAEV, SARDOR ILGORJON UGLI			Event #
Birthdate	Age 24	Gender M	FSI #
Date of Action 09/27/2023	Location Code SDC/FLD	Family #	
Country of Birth UZBEK	Country of Citizenship UZBEK		
Date, Place, and Time of Last Entry/Attempted Entry 09/27/2023 0406 - TECATE, CA - S OF I-8, E OF CARRIZO GORGE RD/DOCS, W OF			
Method of Apprehension Patrol Border	At / Near BLV-32 D - S OF I-8, E OF	Apprehension Date/Time 09/27/2023 0406	
Apprehending Agent GONZALEZ JUAN			

Intake Guide (check if completed / required)

- ☐ Family Unit Created (If Necessary)
- ☐ Biometrics Submitted
- ☐ Placed in a Cell
- ☐ FPQ2
- ☐ Record Check or Additional Checks
- ☐ Disposition Categorized
- ☐ CDS
- ☐ A# Issued and e3 Updated

Processing Guide

- ☐ E3 DM Updates
- ☐ Booking
- ☐ Processing Complete Action
- ☐ Subject Manifested or Booked Out



CDS / Disposition Guide

Processing Priority Low	CDS Classification ☒ FIRA ☐ SOTA ☐ PERA ☐ CRMA ☐ FMUA ☐ SGDA ☐ TGDA	Processing Disposition ☐ ER ☐ Reinstate ☐ VR ☐ WA/NTA ☒ NTA Claims Fear? ☐ Yes ☐ No
Criminal History ☐ Yes ☒ No	CDS Program ☐ CCI ☐ Str_Pros ☐ _____ ☐ _____	
Prosecution ☐ Yes ☒ No		
Prosecution Charge ☐ 1324 ☐ 1325 ☐ 1326 ☐ Mat Wit ☐ _____		

EXHIBIT D

Form I-589, Application for Asylum and Withholding of Removal

EXHIBIT E

I-589 Receipt Notice (Form I-797C)

EXHIBIT F

USCIS Account Access Notice for I-589

EXHIBIT G

Notice of Forwarding of Form I-589 to EOIR

U.S. Department of Homeland Security
USCIS Asylum Vetting Center
401 W. Peachtree St. NW, Ste. 2500, Atlanta, Georgia 30308



U.S. Citizenship
and Immigration
Services

Date: September 23, 2025

SARDOR TUKHTAEV



RE: TUKHTAEV, SARDOR, .



Notice of Forwarding of Form I-589 to EOIR

Dear SARDOR TUKHTAEV:

This letter refers to your Form I-589, *Application for Asylum and for Withholding of Removal*, filed with U.S. Citizenship and Immigration Services (USCIS).

DHS records also indicate that you were issued a Form I-862, Notice to Appear (NTA), but your NTA had to be refiled with the immigration court. The asylum office is issuing you a new NTA and forwarding your Form I-589 to the appropriate immigration court. The date that U.S. Citizenship and Immigration Services (USCIS) received your Form I-589 is considered the filing date for purposes of the one-year filing deadline. At this time, you are not required to file another Form I-589 with the immigration court. **WHERE APPLICABLE: The forwarding of your Form I-589 includes the dependents included on your Form I-589 who are listed above.**

Additional information about your case is available by calling the Executive Office for Immigration Review (EOIR) Automated Case Information Hotline at (800) 898-7180 (TDD: 800-828-1120) (nationwide toll-free) or (304) 625-2050 (local toll call) or by checking the EOIR Automated Case Information online system at <https://portal.eoir.justice.gov/InfoSystem>. For a list of immigration court locations, please visit the EOIR website at <https://www.justice.gov/eoir/find-immigration-court-and-access-internet-based-hearings>.

You may remain in the United States until your asylum application is decided. If you wish to leave the United States while your application is pending, you must obtain advance parole or, for Temporary Protected Status (TPS) recipients, approval of Form I-512T, Authorization for Travel by a Noncitizen to the United States (sometimes referred to as MTINA TPS travel authorization), from USCIS or you may be considered to have abandoned your asylum application.

Please include your full name, alien number (A-number) listed above, and your current address on any correspondence with U.S. Citizenship and Immigration Services (USCIS) or the immigration court.

Change of Address:

You must report a change of address to USCIS within 10 days of moving by following the instructions

EXHIBIT H

I-765 Receipt Notice (Form I-797C)

EXHIBIT I

I-765 Approval Notice (Form I-797)

EXHIBIT J

Social Security Administration Ineligibility Letter

Social Security Administration
Important Information

Office Address:
Social Security Administration
SOCIAL SECURITY
UNIT 4
9300 ASHTON RD
PHILADELPHIA, PA 19114-3531
Phone: 866-331-7840
Date: October 5, 2023

SARDOR TUKHTAEV

This notice is not proof of ineligibility for a Social Security number or card.

We cannot issue you a Social Security card or update your Social Security Number at this time because:

Your documents show that you are not allowed to work in the U.S. and you do not have a valid reason to get a non-work Social Security number. Because we are not able to give you a Social Security card, we did not verify your documents with the issuing agency(ies).

Please contact us when:

You can give us the document(s) we need.

You can come in for a personal interview.

Your alien status changes, or is renewed, so you can work in the U.S.

If You Disagree

If you think you should get a Social Security number or card based on what you have given us, you can ask us to review your case. Someone who did not look at your first application will review it. Please contact us to ask for a review.

If You Want an Interpreter to Help You

We provide free interpreter services to help you conduct your Social Security Business. These interpreter services are available whether you talk to us by phone or in the Social Security office. Call our toll-free number, 1-800-772-1213, press 3 if you need an interpreter in Spanish, and stay on until the representative answers. An interpreter who speaks Spanish will be contacted to help with your call. If your business cannot be completed by phone, we will make an appointment for you at a local Social Security office and arrange for an interpreter to be there at the time of your visit.

Need More Help?

1. Visit www.ssa.gov for fast, simple and secure online service.
2. Call us at 1-800-772-1213, weekdays from 8:00 am to 7:00 pm. If you are deaf or hard of hearing, call TTY 1-800-325-0778. Please mention this letter when you call.
3. You may also call your local office at 866-331-7840.

SOCIAL SECURITY
UNIT 4

Form SSA-L676(02-2022)

EXHIBIT K

ICE Detainee Locator – Philadelphia ERO Location

3/25/26, 4:02 PM

search

 Official Website of the Department of Homeland Security



Report Crimes: Email or Call 1-866-DHS-2-ICE

[Home](#) | [Who We Are](#) | [What We Do](#) | [Newsroom](#) | [Information Library](#) | [Contact ICE](#)

[< BACK TO RESULTS](#)

Facility Page

Detention Information For:

SARDOR ILGORJON UGLI TUKHTAEV

Country of Birth: Uzbekistan

A-Number: 

Current Detention Facility:

Call ICE For Details

ERO Office Information

Family members and legal representatives may be able to obtain additional information about this individual's case by contacting this ERO office:

PHILADELPHIA, PA, DOCKET CONTROL
OFFICE

[Privacy](#) - [Terms](#)

<https://locator.ice.gov/odls/#/details>

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Ex. K-001

3/25/26, 4:02 PM

search

Phone Number: (215) 656-7164

[BACK TO SEARCH >](#)

Related Information

Helpful Info

[Status of a Case](#)

[About the Detainee Locator](#)

[Brochure](#)

[ICE ERO Field Offices](#)

[ICE Detention Facilities](#)

[Privacy Notice](#)

External Links

[Bureau of Prisons Inmate Locator](#)

<https://locator.ice.gov/odls/#/details>

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Ex. K-002

3/25/26, 4:02 PM

search



[DHS.gov](#)[USA.gov](#) [OIG](#) [Open](#) [FOIA](#) [Metrics](#) [No](#) [Site](#) [Site Policies & Plug-Ins](#)
[Gov](#) [Fear](#) [Map](#)
[Act](#)

<https://locator.ice.gov/odls#/details>

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Ex. K-003

PROOF OF SERVICE

I, Robert Bond, Esquire, hereby certify that on March 25, 2026, I caused a true and correct copy of the foregoing Exhibit Package in Support of Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 to be served upon the following:

United States Attorney's Office

Eastern District of Pennsylvania
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106
Via CM/ECF and U.S. Mail

Warden, Detention Facility

[Address to be confirmed upon identification
of current detention facility]
Via U.S. Mail

Field Office Director

Philadelphia ERO Field Office
1600 Callowhill Street
Philadelphia, PA 19130
Via U.S. Mail

Todd Lyons, Acting Director

U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536
Via U.S. Mail

Markwayne Mullin, Secretary

U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528
Via U.S. Mail

Pamela Bondi, Attorney General

U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530
Via U.S. Mail

Respectfully submitted,

/s/ Robert Bond

ROBERT BOND, ESQUIRE