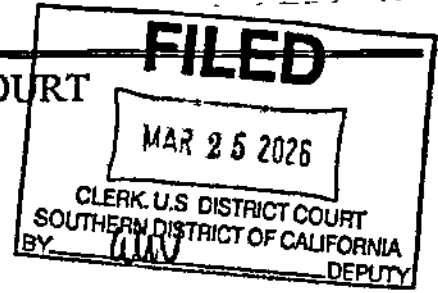


AO 242 (Rev 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT
for the
Southern District of California



SEN,EBRU

Petitioner

v.

Todd M. Lyons Acting Director of US ICE
-Warden of Otay Mesa Detention Center
Additional names send front of habeas form

Respondent

(name of warden or authorized person having custody of petitioner)

Case No. '26CV1901 CAB VET
(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name. SEN,EBRU
(b) Other names you have used. N/A
2. Place of confinement:
(a) Name of institution: Otay Mesa Detention Center San Diego CA
(b) Address: 7488 Calzade La Fuente 92154 OMDC
- (c) Your identification number: [REDACTED]
3. Are you currently being held on orders by:
 Federal authorities State authorities Other - explain: _____
4. Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you: _____
(b) Docket number of criminal case: _____
(c) Date of sentencing: _____
 Being held on an immigration charge
 Other (explain): _____

Decision or Action You Are Challenging

5. What are you challenging in this petition:
 How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

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- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (explain): _____

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: Asylum-Division District 3 USCIS Reconsider,
United states Immigration Customs and Enforcement

(b) Docket number, case number, or opinion number: _____

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

I have been in ICE Custody in OMDC for 5 months(10/21,2025) the day from my arrest and until now,They didn't
accept my case for asylum application I appealed USCIS for couple times with my Immigration Attorney. But ev-
ery time there was no cause showed by USCIS and given NEGATIVE to my case They try to deport me 11/28/25

(d) Date of the decision or action: 11/28/2025

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

- Yes
- No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised. _____

(b) If you answered "No," explain why you did not appeal: There is no case pending on my name

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

- Yes
- No

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(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal: No appeal available

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised. _____

(b) If you answered "No," explain why you did not file a third appeal: No appeal available

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

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If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

Yes No

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: _____

11. Appeals of Immigration proceedings

Does this case concern immigration proceedings?

Yes No

If "Yes," provide:

- (a) Date you were taken into immigration custody: 10/21/2025
- (b) Date of the removal or reinstatement order: 11/28/2025
- (c) Did you file an appeal with the Board of Immigration Appeals?

Yes No

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If "Yes," provide:

(1) Date of filing: _____

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

(d) Did you appeal the decision to the United States Court of Appeals?

Yes

No

If "Yes," provide:

(1) Name of court: _____

(2) Date of filing: _____

(3) Case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

12. Other appeals

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

Yes

No

If "Yes," provide:

(a) Kind of petition, motion, or application: _____

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

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Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: Medical issues in facility.

(a) Supporting facts *(Be brief Do not cite cases or law.):*
Addendum to Ground ONE is on back of habeas form.

Addendum to Ground ONE is available at back of the habeas form

(b) Did you present Ground One in all appeals that were available to you?
 Yes No

GROUND TWO: We have a deportation order against us We are being held in ICE custody at OMDG.
We have no case pending, and USCIS consistently gives negative reports.

(a) Supporting facts *(Be brief Do not cite cases or law.):*
Addendum to Ground Two is on back of habeas form.

Addendum to Ground TWO is available at back of the habeas form

(b) Did you present Ground Two in all appeals that were available to you?
 Yes No

GROUND THREE: I cannot access the necessary documents for my case. I am completely cut off from the
outside world, and my communication with my family restricted.

(a) Supporting facts *(Be brief Do not cite cases or law.):*
Addendum to Ground Three is on back of Habeas Form.

Addendum to Ground THREE is available at back of the habeas form

(b) Did you present Ground Three in all appeals that were available to you?
 Yes No

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GROUND FOUR: Facility hygiene, food, and showering problems are causing issues for my illness.

(a) Supporting facts (Be brief. Do not cite cases or law.):

Addendum to Ground FOUR is on back of Habeas Form

Addendum to Ground FOUR is available at back of the habeas form

(b) Did you present Ground Four in all appeals that were available to you?

Yes

No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: Appeal would be futile because now I don't have any case pending, I never had it in this 5 month, I am worried for my health in this stressful circumstances.

Request for Relief

15. State exactly what you want the court to do: I respectfully request my immediate release from detention, or, in the alternative, a bond hearing at which the government must prove by clear and convincing evidence that my continued detention necessary I want the court to consider my rights regarding bond and parole because the immigration court doesn't grant any of these rights to me or others like me, even though what they were doing is unlawful My husband Sen, Zafer ~~XXXXXXXXXX~~ Without him I can't stay strong on my life cause of my sickness he provides me everything as much as he can Please we need help for my sickness and for our lives all we are asking is living a life with human dignity. Best Regards.

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Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 03.20.2026

Elmer

Signature of Petitioner

Signature of Attorney or other authorized person, if any

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Instructions

1. **Who Should Use This Form.** You should use this form if
 - you are a federal prisoner and you wish to challenge the way your sentence is being carried out (*for example, you claim that the Bureau of Prisons miscalculated your sentence or failed to properly award good time credits*);
 - you are in federal or state custody because of something other than a judgment of conviction (*for example, you are in pretrial detention or are awaiting extradition*); or
 - you are alleging that you are illegally detained in immigration custody.
2. **Who Should Not Use This Form.** You should not use this form if
 - you are challenging the validity of a federal judgment of conviction and sentence (*these challenges are generally raised in a motion under 28 U.S.C. § 2255*);
 - you are challenging the validity of a state judgment of conviction and sentence (*these challenges are generally raised in a petition under 28 U.S.C. § 2254*); or
 - you are challenging a final order of removal in an immigration case (*these challenges are generally raised in a petition for review directly with a United States Court of Appeals*).
3. **Preparing the Petition.** The petition must be typed or neatly written, and you must sign and date it under penalty of perjury. A false statement may lead to prosecution.
4. **Answer all the questions.** You do not need to cite law. You may submit additional pages if necessary. If you do not fill out the form properly, you will be asked to submit additional or correct information. If you want to submit any legal arguments, you must submit them in a separate memorandum. Be aware that any such memorandum may be subject to page limits set forth in the local rules of the court where you file this petition. If you attach additional pages, number the pages and identify which section of the petition is being continued. All filings must be submitted on paper sized 8½ by 11 inches. **Do not use the back of any page.**
5. **Supporting Documents.** In addition to your petition, you must send to the court a copy of the decisions you are challenging and a copy of any briefs or administrative remedy forms filed in your case.
6. **Required Filing Fee.** You must include the \$5 filing fee required by 28 U.S.C. § 1914(a). If you are unable to pay the filing fee, you must ask the court for permission to proceed in forma pauperis – that is, as a person who cannot pay the filing fee – by submitting the documents that the court requires.
7. **Submitting Documents to the Court.** Mail your petition and _____ copies to the clerk of the United States District Court for the district and division in which you are confined. For a list of districts and divisions, see 28 U.S.C. §§ 81-131. All copies must be identical to the original. Copies may be legibly handwritten.

If you want a file-stamped copy of the petition, you must enclose an additional copy of the petition and ask the court to file-stamp it and return it to you.
8. **Change of Address.** You must immediately notify the court in writing of any change of address. If you do not, the court may dismiss your case.

Respondent

*Patrick Divver Regional, Director Enforcement, and
Removal Operations, San*

*diego, field, office U.S. Immigration and Customs
Enforcement*

*Todd M .Lyons Acting Director of U.S. Immigration
, Customs Enforcement*

*Kristi Noem Secretary of the U.S. Department of
Homeland Security*