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7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**

9 **GURJEET SINGH,**

10 Petitioner

Case No.: **'26CV2278 JES BLM**

11 VS.

**PETITION FOR WRIT OF HABEAS
CORPUS**

12 **Christopher J LaRose** Warden Otay Mesa
13 **Detention Center; Markwayne Mullin,**
14 **Secretary Department of Homeland Security;**
15 **Todd M Lyons** Acting Director United States
16 **Immigration and Customs Enforcement;**
17 **Todd Blanche** United States Attorney
18 **General**

19 Respondents

20 **PETITION FOR WRIT OF HABEAS CORPUS**
21 **PURSUANT TO 28 U.S.C. §2241**

22
23 Petitioner respectfully petitions this Honorable court for writ of habeas corpus to remedy
24 petitioner's unlawful detention by the respondents as follows:

25 Dated this April 10, 2026.

26 _____
27 Sajjad Hussain, Esq.

28 **PETITION FOR WRIT OF HABEAS CORPUS**

1 **I. INTRODUCTION:**

- 2 1. Petitioner, Gurjeet Singh, a native and citizen of India, *Ex 1 NTA*, brings this Petition
3 for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 to challenge the legality of his
4 current immigration detention. After more than a year of liberty in the community under
5 an Order of release on parole, during which he fully complied with all conditions and
6 committed no offenses, the Department of Homeland Security (“DHS”) summarily re-
7 arrested him in January 2026 without notice, without a hearing, and without any
8 individualized determination.
9
10 2. Petitioner was initially released on Jan 15, 2025, on parole, *Ex 2 Interim Notice*
11 *Authorizing Parole*. Thereafter, Petitioner remained compliant with all terms and
12 conditions of his release and reported to ICE as required.
13
14 3. However, in January 2026 when Petitioner appeared for a routine ICE check-in, he was
15 taken into custody without any prior notice, without a pre-detention hearing, and without
16 any explanation for his detention.
17
18 4. Petitioner’s detention is unlawful and violates the Due Process Clause of the Fifth
19 Amendment.
20
21 5. First, DHS violated Petitioner’s procedural due process rights by revoking long-
22 standing, government-authorized liberty without providing notice or a meaningful
23 opportunity to be heard. For over a year, DHS permitted Petitioner to live in the
24 community under supervision and repeatedly accepted his compliance. In January 2026,
25 Petitioner appeared for a routine ICE check-in as required. DHS took him into custody
26 on the spot, without advance warning, without stating any basis for re-detention, and
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1 without conducting any custody review. This summary deprivation of liberty violates
2 core procedural due process protections.

3
4 6. Second, DHS violated substantive due process by detaining Petitioner even though
5 detention is no longer reasonably related to any legitimate immigration purpose. DHS
6 previously determined that detention was unnecessary and that supervision was
7 sufficient. Nothing materially changed at the time of Petitioner's re-arrest. He remained
8 compliant, posed no flight risk, and was not alleged to be dangerous. Under these facts,
9 continued detention is excessive, punitive in effect, and unsupported by any regulatory
10 justification.

11
12 7. DHS failed to identify any changed circumstances, failed to determine that removal had
13 become reasonably foreseeable, and also failed to provide any of the required procedural
14 protections. DHS's disregard of the relevant regulations renders Petitioner's detention
15 unlawful from its inception.

16
17 8. Petitioner's continued confinement has caused concrete harm. Because Petitioner's
18 detention results from multiple constitutional and regulatory violations, habeas relief is
19 required. Liberty was withdrawn without due process, and detention no longer serves
20 any legitimate immigration purpose. Under these circumstances, continued confinement
21 is punitive and unlawful. Petitioner therefore seeks immediate release from immigration
22 custody, subject to reasonable conditions of supervision if the Court deems them
23 necessary.
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1 **II. CUSTODY**

2 9. Mr. Singh is detained in the legal and physical custody of Respondents at Otay Mesa
3 Detention Center, San Diego, CA where he is under the direct control of Respondents
4 and their agents.
5

6 **III. JURISDICTION**

7 10. This action arises under the Constitution of the United States and the Immigration and
8 Nationality Act, 8 U.S.C. § 1101 et seq.

9 11. Jurisdiction is proper under 28 U.S.C § 2241 (habeas corpus); 28 U.S.C. § 1331 (federal
10 question); 28 U.S.C. § 1651 (All Writs Act); U.S. Const. art. I, § 9, cl. 2 (the Suspension
11 Clause); and 5 U.S.C. § 702 (Administrative Procedure Act).
12

13 **IV. VENUE**

14 12. Venue is proper in this district under 28 U.S.C. § 1391(b) and (e) because at least one
15 Respondent—Respondent Christopher J LaRose, the legal custodian of Mr. Singh—is
16 in this District, and a substantial part of the events giving rise to the claims in this action
17 took place in this District. All material decisions about Mr. Singh’s detention have been
18 made within this jurisdiction.
19

20 **V. EXHAUSTION**

21 13. Mr. Singh is not required to exhaust administrative remedies. Exhaustion for habeas
22 claims is prudential, not jurisdictional. See *Laing v. Ashcroft*, 370 F.3d 994, 997 (9th
23 Cir. 2004). The prudential exhaustion requirement may be waived if ““administrative
24 remedies are inadequate or not efficacious, pursuit of administrative remedies would be
25 a futile gesture, [or] irreparable injury will result.”” *Id.* at 1000. Administrative remedies
26 would be futile, inadequate, and not efficacious for Mr. Singh. Exhausting his
27
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1 constitutional claim would be futile because the agency does not have the authority to
2 rule on constitutional questions. See *Wang v. Reno*, 81 F.3d 808, 815–16 (9th Cir. 1996)
3 (per curiam) (“the inability of the INS to adjudicate the constitutional claim completely
4 undermines most, if not all, of the purposes underlying exhaustion”).
5

6 14. Exhausting his statutory claim would also be futile because the Immigration Judge (“IJ”)
7 adjudicating Mr. Singh’s merits case—and to whom his bond hearing request would
8 likely be assigned—acts under the authority of the Attorney General and is required to
9 follow precedent set by the Board of Immigration Appeals (BIA). The BIA, in *Matter*
10 *of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), held that Immigration Judges lack
11 authority to hear bond requests or grant bond to individuals who are present in the
12 United States without admission.
13

14 15. Even if exhaustion were not futile, waiver is warranted because Mr. Singh’ claim
15 presents purely legal issues, and no purpose is served by requiring an administrative
16 appeal. See *Hernandez v. Sessions*, 872 F.3d 976, 988–89 (9th Cir. 2017).
17

18 VI. PARTIES

19 16. Petitioner is a native and citizen of India who is detained in the custody of Immigration
20 and Customs Enforcement at Otay Mesa Detention Center San Diego, CA.
21

22 17. Respondent **Christopher J LaRose** is the Warden of Otay Mesa Detention Center San
23 Diego, CA, where Petitioner is detained. He is sued in his official capacity.

24 18. Respondent **Markwayne Mullin** is the Secretary of the Department of Homeland
25 Security, an agency of the United States. He is responsible for the administration and
26 enforcement of the immigration laws. See 8 U.S.C. § 1103(a). Respondent is a legal
27 custodian of Petitioner. He is sued in his official capacity.
28

1 19. Respondent **Todd M. Lyons** is performing the duties of the Director of U.S.
2 Immigration and Customs Enforcement (ICE). He is sued in his official capacity.

3
4 20. Respondent **Todd Blanche** is the Acting Attorney General of the United States. As
5 Attorney General, Respondent has the authority to interpret the immigration laws and
6 adjudicate removal cases and bond hearings. See 8 U.S.C. § 1103(g). The Attorney
7 General delegates this responsibility to the Executive Office for Immigration Review,
8 which administers the immigration courts and the BIA. Respondent is a legal custodian
9 of Petitioner. He is sued in his official capacity.
10

11 **VII. FACTUAL ALLEGATIONS**

12 21. Petitioner, Gurjeet Singh, is a native and citizen of India who is currently detained in
13 immigration custody at the Otay Mesa Detention Center in California.

14 22. Mr. Singh was born on [REDACTED], in Kahlwan Village, Jalandhar District,
15 Punjab, India, *Ex 3 CFI Notes*. He lived in Punjab until he was forced to flee due to
16 threats to his life and safety. Prior to leaving India, he worked as a driver and relied on
17 daily labor to support himself, *Id*.

18
19 23. Beginning around 2020, Mr. Singh became an active supporter of the [REDACTED]
20 [REDACTED] political party. His involvement included attending meetings,
21 organizing events, distributing materials, and publicly promoting the party's message
22 within his community. His political activities were visible and widely known, *Ex 3*.

23
24 24. Due to his political involvement, Mr. Singh was targeted by members and supporters of
25 the [REDACTED]. These individuals repeatedly pressured him to
26 abandon his political beliefs and join their party. When he refused, he was subjected to
27 threats and violence, *Id*.
28

1 25. As a result of attacks and threats to his life, Mr. Singh fled India and ultimately arrived
2 in the United States, where he now seeks protection. He has filed applications for
3 asylum, withholding of removal, and protection under the Convention Against Torture,
4 all of which remain pending before the Immigration Court.
5

6 26. Upon his arrival, Mr. Singh was taken into immigration custody. He was subsequently
7 released on January 15, 2026 from detention under an order of supervision/parole and
8 lived in the community in compliance with all conditions imposed upon him, *Ex 2*.
9 During this period, he complied with all reporting requirements, did not violate any
10 conditions, and did not commit any criminal offenses.
11

12 27. Despite his full compliance and without any violation of the terms of his release, Mr.
13 Singh was re-detained in January 2026 by Immigration and Customs Enforcement
14 (“ICE”). At the time of his re-detention, ICE did not provide him with any prior notice,
15 explanation, or justification for taking him back into custody. He was not alleged to
16 have violated any condition of release, nor was he accused of any new conduct that
17 would justify detention.
18

19 28. Mr. Singh has continued to pursue relief from removal, including asylum, withholding
20 of removal, and protection under the Convention Against Torture, which remain
21 pending before the Immigration Court.
22

23 29. Mr. Singh’s current detention is ongoing and prolonged. His re-detention—despite prior
24 release, full compliance, and absence of any violation—has resulted in a severe
25 deprivation of liberty without adequate procedural safeguards.
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1 **VII. LEGAL ARGUMENT**

2 **COUNT I**

3 ***A. Violation of the Fifth Amendment Due Process Clause***

4
5 30. The Fifth Amendment's Due Process Clause applies to all persons within the United
6 States, including noncitizens held in civil immigration custody. *Zadvydas*, 533 U.S. at
7 693. Because immigration detention is civil rather than criminal, it is constitutionally
8 permissible only insofar as it remains nonpunitive and reasonably related to a legitimate
9 governmental purpose, and only when imposed through constitutionally adequate
10 procedures. *Id.* at 690; *Wong Wing v. United States*, 163 U.S. 228, 237 (1896).

11
12 31. Freedom from physical restraint lies at the core of the liberty protected by the Due
13 Process Clause. *Zadvydas*, 533 U.S. at 690. Accordingly, civil detention that loses its
14 regulatory justification, becomes excessive in relation to its purpose, or is imposed
15 without adequate procedural safeguards raises serious constitutional concerns. Outside
16 limited and carefully regulated contexts, the government may not deprive an individual
17 of physical liberty without strong justification and meaningful processes. *United States*
18 *v. Salerno*, 481 U.S. 739, 746 (1987); *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992).

19
20 32. These principles frame the constitutional inquiry here. Where the government has
21 affirmatively authorized liberty, allowed that liberty to persist for about two years, and
22 then withdrawn it through physical detention without notice, hearing, or individualized
23 justification, habeas corpus provides the appropriate vehicle for judicial review. The
24 Court must therefore assess whether Petitioner's re-detention remains reasonably
25 related to a legitimate immigration purpose and whether it was imposed through
26 procedures sufficient to satisfy the Fifth Amendment.
27
28

1 **(i) Substantive Due Process**

- 2 33. Petitioner seeks immediate release because, under the Fifth Amendment's Due Process
3 Clause, his continued detention is no longer reasonably related to a legitimate
4 immigration purpose and has instead become punitive and harmful in effect.
- 5
- 6 34. Under the substantive component of the Fifth Amendment's Due Process Clause, civil
7 immigration detention violates the Constitution when it ceases to advance its regulatory
8 purpose and instead inflicts serious harm. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001);
9 *Wong Wing v. United States*, 163 U.S. 228, 237 (1896).
- 10
- 11 35. Here, DHS re-arrested Petitioner in January 2026 after he had lived in the community
12 for more than a year under an Order of Supervision without incident. During that period,
13 Petitioner complied with all conditions of supervision, including reporting to ICE as
14 directed. He did not commit any criminal offenses. DHS did not provide advance notice,
15 an opportunity to be heard, or any individualized custody determination prior to his re-
16 detention. Under these facts, detention no longer advances any legitimate civil objective.
- 17
- 18 36. Here, the current detention has also become affirmatively harmful. When DHS initially
19 released Petitioner and allowed him to live in the community, it created an implied
20 promise on which Petitioner relied in structuring his life. Prior to detention, Petitioner
21 worked and contributed to the community.
- 22
- 23 37. Moreover, DHS is not detaining Petitioner after making any findings of dangerousness
24 supported by the heightened safeguards the Constitution requires. Under the Fifth
25 Amendment, civil detention that inflicts serious harm while failing to serve its
26 regulatory purpose is unconstitutional, even where statutory detention authority exists.
27 *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).
- 28

1 38. Courts in California have granted habeas relief on materially similar facts. In Rios
2 v.Noem, No. 3:25-cv-02866-JES-VET (S.D. Cal. Nov. 10, 2025), the court ordered
3 release where DHS re-detained a noncitizen after years of successful supervision
4 without demonstrating that renewed detention was reasonably related to a legitimate
5 regulatory purpose. Similarly, in Constantinovici v. Bondi, No. 3:25-cv-02405-RBM-
6 AHG (S.D. Cal. Oct. 10, 2025), the court granted habeas relief where DHS revoked
7 supervision despite years of compliance and no materially changed circumstances. The
8 court reached the same conclusion in Kaztashyan v. Warden of the Golden State Annex
9 Detention Facility, No. 1:25-cv-01526-DC-SCR (E.D. Cal. 2025), emphasizing that
10 prolonged compliance under supervision weighs strongly against re-detention absent an
11 individualized justification.
12
13

14 39. As in those cases, detention here has ceased to function as a civil regulatory measure.
15 In addition, unlike many re-detention cases, the harm here is acute and documented.
16 Recent reports indicate that number of detainees have been died in the custody of
17 respondent under similar conditions for lack of medical care¹.
18

19 ***(ii) Procedural Due Process Violation***

20 40. Separately and independently, Petitioner seeks immediate release because DHS violated
21 procedural due process under the Fifth Amendment when it revoked his long-standing,
22 government-authorized liberty without notice and without any opportunity to be heard.
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¹ <https://www.fox4news.com/news/afghan-soldier-dies-ice-custody-mohammad-paktyawal>
PETITION FOR WRIT OF HABEAS CORPUS

1 41. Under the Fifth Amendment, procedural due process is required whenever the
2 government seeks to deprive a person of physical liberty. At its core, due process
3 requires notice and an opportunity to be heard at a meaningful time and in a meaningful
4 manner. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). Here, when petitioner was
5 rearrested in January 2026, he was not given notice or an opportunity to be heard in the
6 incept of the detention, notice is required before detention and without such procedure,
7 the current detention is unlawful.
8

9 42. When the government affirmatively confers liberty and later withdraws that liberty
10 through detention, due process requires procedures sufficient to guard against erroneous
11 or arbitrary confinement. *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972). Here,
12 petitioner was allowed to live at liberty for over a year that the government gave him,
13 such liberty cannot be summary withdrawn without safeguards.
14

15 43. Courts assess the adequacy of procedural protections by balancing three factors: (1) the
16 private interest affected, (2) the risk of erroneous deprivation under the procedures used
17 and the value of additional safeguards, and (3) the government's interest. *Mathews*, 424
18 U.S. at 335.
19

20 44. Courts in California have applied this framework to challenges arising from
21 immigration re-detention following supervised release. See, e.g., *Rios v. Noem*, No.
22 3:25-cv-02866-JES-VET (S.D. Cal. Nov. 10, 2025); *Constantinovici v. Bondi*, No.
23 3:25-cv-02405-RBM-AHG (S.D. Cal. Oct. 10, 2025); *Kaztashyan v. Warden of the*
24 *Golden State Annex Detention Facility*, No. 1:25-cv-01526-DC-SCR (E.D. Cal. 2025);
25 *Khan v. Noem*, No. 1:25-cv-01411-EPG-HC, 2025 WL 3089352, at *5 (E.D. Cal. Nov.
26 5, 2025).
27
28

1 **c. Government's Interest**

2 54. The third Mathews factor considers the government's interest and the administrative
3 burdens of additional procedures. Mathews, 424 U.S. at 335.

4
5 55. The government's general interests include ensuring appearance at proceedings and
6 protecting the community. Zadvydas, 533 U.S. at 690. Those interests are not
7 meaningfully advanced by summary re-detention on these facts. DHS managed
8 Petitioner through community supervision, during which he consistently appeared for
9 check-ins and was never alleged to have violated conditions or posed a danger.
10 Hernandez v. Sessions, 872 F.3d 976, 994 (9th Cir. 2017); Garcia v. Andrews, 2025 WL
11 1927596, at *5 (E.D. Cal. July 14, 2025).

12
13 56. Courts have repeatedly rejected the notion that providing notice and an individualized
14 custody determination imposes a significant administrative burden. Custody hearings
15 are routine, and the government's interest in detaining a petitioner without a hearing is
16 low. Khan v. Noem, 2025 WL 3089352, at *5; Diaz v. Kaiser, 2025 WL 1676854, at *3
17 (N.D. Cal. June 14, 2025); Carballo v. Andrews, 2025 WL 2381464, at *8 (E.D. Cal.
18 Aug. 15, 2025); Ortega v. Bonnar, 415 F. Supp. 3d 963, 970 (N.D. Cal. 2019).

19
20 57. Requiring minimal procedural safeguards would not impede enforcement. It would
21 simply require DHS to justify detention through an individualized determination rather
22 than default incarceration.

23
24 **d. Balancing the Mathews Factors**

25 58. When the Mathews factors are balanced, they favor Petitioner. Petitioner's liberty
26 interest is substantial. The risk of erroneous deprivation is significant where DHS
27 withdraws long-standing conditional liberty without notice or an opportunity to be heard.
28

1 At the same time, the government's interests can be adequately protected through
2 procedures requiring individualized justification for detention. Kaztashyan; Khan;
3 R.D.T.M.; Doe v. Becerra, 787 F. Supp. 3d at 1093.
4

5 59. Accordingly, DHS's summary re-detention of Petitioner, by revoking his liberty without
6 notice and without a meaningful opportunity to be heard, violates the Due Process
7 Clause of the Fifth Amendment.

8 ***COUNT II***

9 ***Violation of Article III and Separation of Powers Through Executive Defiance of***
10 ***Judicial Authority***

11 60. Petitioner seeks immediate release from custody because the Executive Branch has
12 exceeded its constitutional authority and encroached upon the exclusive role of Article
13 III courts. Where the executive branch detains a person while openly disregarding
14 binding federal court decisions and insulating detention decisions from meaningful
15 judicial enforcement, continued confinement violates the Constitution's separation of
16 powers and renders executive adjudication constitutionally inadequate.
17

18 61. Article III of the United States Constitution vests the judicial power of the United States
19 exclusively in the federal courts. U.S. Const. art. III, § 1. That authority includes the
20 power to interpret the law and to ensure that executive detention complies with
21 constitutional limits. Habeas corpus serves as a core structural safeguard against
22 executive overreach by permitting courts to test the legality of detention and to order
23 release where constitutional violations persist. *Boumediene v. Bush*, 553 U.S. 723, 765
24 (2008).
25

26 62. Federal courts have repeatedly condemned executive branch detention practices that
27 operate in defiance of Article III authority. That executive defiance was addressed
28

1 directly in *Inzunza v. Warden of Adelanto Detention Facility et al.*, No. 5:26-cv-00078-
2 SSS-BFM (C.D. Cal. Jan. 27, 2026), where the court found that Respondents had
3 “deliberate[ly]” continued to rely on legal interpretations that had already been held
4 unlawful. The court observed that “[d]espite the final judgment in *Maldonado Bautista*,
5 it appears that immigration judges continue to rely on legal interpretations that were
6 expressly found unlawful,” and collaterally estopped Respondents from relitigating the
7 issue.
8

9
10 63. Similarly, the United States District Court for the Western District of Texas granted
11 habeas relief based on executive detention conducted in disregard of constitutional
12 limits. In *Conejo Arias v. Noem*, No. SA-26-CV-415-FB (W.D. Tex. Jan. 31, 2026),
13 Judge Fred Biery ordered immediate release, holding that “the Constitution of these
14 United States trumps this administration’s detention” and emphasizing that
15 “[a]dministrative warrants issued by the executive branch to itself do not pass probable
16 cause muster.” The court further underscored that “[t]he Constitution requires an
17 independent judicial office
18

19 64. Here, this Court can resolve Petitioner’s motion either by ordering his immediate release
20 or by directing Respondent to provide him with a bond hearing before an immigration
21 judge. However, Petitioner submits that immediate release is the appropriate remedy to
22 safeguard against constitutional overreach by the executive branch and to preserve his
23 constitutional rights to due process.
24

25 ***VIII. CONCLUSION***

26 65. For the reasons set forth above, Petitioner’s continued detention is unlawful. DHS re-
27 arrested Petitioner after more than a year of successful supervision in the community,
28

1 without notice, without any individualized justification, and without procedures
2 sufficient to protect against the erroneous deprivation of liberty. Petitioner complied
3 with all conditions of supervision, committed no offenses, and was re-detained without
4 any allegation of noncompliance. Under these facts, detention no longer advances any
5 legitimate immigration purpose and instead constitutes punitive confinement in
6 violation of the Fifth Amendment's Due Process Clause.
7

8 66. Independently, DHS failed to comply with the regulations that limit when previously
9 authorized liberty may be withdrawn. For more than a year, DHS determined that
10 supervision was appropriate. DHS nevertheless re-detained Petitioner without
11 identifying any changed circumstances, without determining that removal had become
12 reasonably foreseeable, and without providing the notice and opportunity to respond
13 required by regulation. When DHS disregards these constraints, the resulting detention
14 is unlawful and violates due process.
15

16
17 67. Finally, DHS's own conduct confirms that continued detention serves no legitimate
18 regulatory function. DHS managed Petitioner through community supervision. Nothing
19 changed in January 2026 other than DHS's unilateral decision to incarcerate him at a
20 routine check-in. No additional administrative action can cure these defects. Immediate
21 judicial intervention is therefore required.
22

23 ***IX. PRAYER FOR RELIEF***

24 *WHEREFORE, Petitioner respectfully requests that this Court:*

- 25 a. Grant the Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241.
26 b. Order Petitioner's immediate release from ICE custody, subject to the same terms and
27 conditions as were before his re-detention
28

- 1 c. Order that Petitioner's property, including any forms of identification taken at the time
2 of re-detention, be returned to him upon release.
- 3 d. Declare that Petitioner's re-arrest and continued detention, violate the Fifth
4 Amendment's Due Process Clause.
- 5 e. In the alternative, order Respondents to provide Petitioner forthwith with an
6 individualized custody determination before a neutral decision-maker, at which the
7 Government bears the burden of justifying continued detention by clear and convincing
8 evidence standard and less restrictive alternatives to detention must be meaningfully
9 considered.
- 10 f. Order that any future arrest, detention, or revocation of supervision involving Petitioner
11 comply with the Constitution and governing law, including advance notice, an
12 individualized determination, and strict adherence to applicable regulations.
- 13 g. Award Petitioner reasonable attorney's fees and costs, including pursuant to the Equal
14 Access to Justice Act, 28 U.S.C. § 2412, and any other applicable authority; and
- 15 h. Grant such other and further relief as the Court deems just and proper.

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17
18
19 *Respectfully Submitted April 10, 2026.*

20
21 */s/ Sajjad Hussain*
22 Sajjad Hussain, Esq.
23 Indus Pacific Law Office, Law Corp
24 Attorney for Petitioner
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26
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