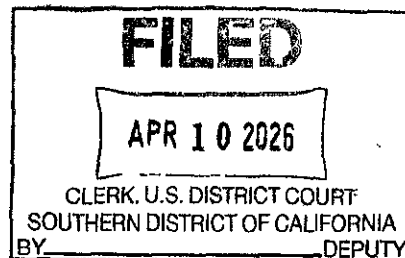


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

CARLOS ALBERTO RAMÍREZ ÁLVAREZ
Petitioner

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE), et al.
Respondents




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

Petitioner, proceeding pro se with the assistance of a non-attorney Next Friend, respectfully petitions this Court for relief.

I. JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 2241.

II. FACTUAL BACKGROUND

Petitioner has been detained since September 23, 2025 at Otay Mesa Detention Center. He has been detained for nearly seven months without a bond hearing. He suffers from anxiety and depression and is under treatment with 

III. CLAIMS FOR RELIEF

- A. Prolonged detention violates due process under *Zadvydas v. Davis*.
- B. Lack of bond hearing violates due process under *Demore v. Kim*.
- C. Prolonged detention without safeguards violates due process (see *Saldana v. DHS*).

IV. REQUEST FOR RELIEF

- 1. Immediate release; or
- 2. A prompt bond hearing;
- 3. Appointment of counsel;
- 4. Any other relief the Court deems just and proper.

V. MOTION FOR APPOINTMENT OF COUNSEL

Petitioner requests appointment of counsel due to detention, language barriers, and lack of access to legal resources.

VI. MOTION FOR BOND HEARING

Petitioner requests a bond hearing due to prolonged detention.

VII. CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Petition and accompanying motions were served on the following:

Clerk of Court
United States District Court
Southern District of California
333 West Broadway, Suite 420
San Diego, CA 92101

Office of the U.S. Attorney
880 Front Street, Room 6293
San Diego, CA 92101

ICE Office of Chief Counsel
880 Front Street, Room 2243
San Diego, CA 92101

Signature:  _____
Next Friend