

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

**FILED**  
APR 29 2026  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_ DEPUTY

SINGH ROBIN JIT  
Petitioner

v.

TODD LYONS, ACTING DIRECTOR OF ICE

Case No. '26CV2724 JO SBC  
(Supplied by Clerk of Court)

MARKWAYNE MULLIN, SECRETARY OF DHS  
Respondent  
(name of warden or authorized person having custody of petitioner)

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

Personal Information

1. (a) Your full name: SINGH ROBIN JIT

(b) Other names you have used: \_\_\_\_\_

2. Place of confinement:

(a) Name of institution: OTAY MESA DETENTION CENTER

(b) Address: 7488 CALZADA DE LA FUENTE, SAN DIEGO CA 92154

(c) Your identification number: A # 

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: OTAY MESA DETENTION CENTER  
IMMIGRATION COURT 7489 CALZADA DE LA FUENTE SAN DIEGO 92154
- (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 DETAINED OVER 15 MONTHS WITHOUT BOND PROLONGED  
DETENTION, LACK OF ASSISTANCE FROM COUNSEL, LACK OF DANGER and  
FLIGHT RISK, PARTIALLY DENIED HABEAS, MENTAL HEALTH.
- (d) Date of the decision or action: \_\_\_\_\_

**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: OTAY MESA DETENTION CENTER  
IMMIGRATION COURT 7489 CALZADA DE LA FUENTE, SAN DIEGO.
- (2) Date of filing: 2025 DECEMBER
- (3) Docket number, case number, or opinion number: \_\_\_\_\_
- (4) Result: DENIED
- (5) Date of result: 2025 DECEMBER
- (6) Issues raised: FLIGHT RISK

(b) If you answered "No," explain why you did not appeal: \_\_\_\_\_

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: N/A

(2) Date of filing: \_\_\_\_\_

(3) Docket number, case number, or opinion number: \_\_\_\_\_

(4) Result: \_\_\_\_\_

(5) Date of result: \_\_\_\_\_

(6) Issues raised: N/A

(b) If you answered "No," explain why you did not file a second appeal: BIA Takes 6-12 months to respond, filing an appeal here would be futile.

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: N/A

(2) Date of filing: \_\_\_\_\_

(3) Docket number, case number, or opinion number: \_\_\_\_\_

(4) Result: N/A

(5) Date of result: \_\_\_\_\_

(6) Issues raised: \_\_\_\_\_

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

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: 8 JANUARY 2025
- (b) Date of the removal or reinstatement order: N/A
- (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: WRIT OF HABEAS CORPUS
- (b) Name of the authority, agency, or court: U.S. DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA 333 WEST BROADWAY, SUITE 420 SAN DIEGO CA 92101
- (c) Date of filing: FEB-17-2026
- (d) Docket number, case number, or opinion number: 26-CV-02095-BAS-DED
- (e) Result: DENIED
- (f) Date of result: 04-21-2026
- (g) Issues raised: I'S SAID I HAVE FLIGHT RISK.

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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: PROLONGED AND INDEFINITE OR UNNECESSARY DETENTION DETAINED MORE THAN A YEAR WITHOUT ANY ORDER OF REMOVAL

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

I HAVE BEEN DETAINED FOR OVER 15 MONTHS. I WAS ARRESTED 09-JAN-2026 IJ DENIED MY BOND COURT ON DECEMBER 2025. MY CONTINUED DETENTION HAS BECOME PUNITIVE RATHER THAN REGULATORY AND IT IS UNLIKELY THAT I WILL BE RELEASE.

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

Yes No

GROUND TWO: PARTIALLY DENIED MY HABEAS

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

HIGHER AUTHORITY GRANTS ME MY HABEAS ON MARCH 2026. AFTER IJ DENIED MY BOND AND SAID ME YOU HAVE FLIGHT RISK, BUT CANNOT PROVE THAT WITHOUT CONVINCING EVIDENCE. SECONDLY, HIGHER AUTHORITY DENIED MY HABEAS DUE TO PROPER ASSISTANCE FROM COUNSEL.

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

Yes No

GROUND THREE: LACK OF ASSISTANCE FROM COUNSEL / ABSENT FROM COURT

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

I WAS NOT INFORMED BY MY ATTORNEY ABOUT MY PREVIOUS SCHEDULED BOND HEARING. WHEN I WENT TO MY BOND HEARING. I WAS MET WITH ANOTHER INDIVIDUAL ON BEHALF OF MY ATTORNEY. THE INDIVIDUAL WHO WAS PRESENT ON MY ATTORNEY'S BEHALF WAS NOT PREPARED TO UNDERSTAND MY CASE.

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

Yes No

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GROUND FOUR: PROLONGED DETENTION IMPACT MY MENTAL HEALTH  
VULNERABLE STATUS.

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

WHILE BEING IN DETENTION FOR OVER 15 MONTHS CONTINUOUSLY  
I HAVE BEEN SUFFERING FROM DEPRESSION, ANXIETY AND  
ALSO HAVE MIGRAINE PROBLEMS, WHICH IS GETTING WORSED  
DAY BY DAY, THIS FACILITY IS UNABLE TO PROVIDE THE NECESSARY  
CARE TO HELP WITH MY ONGOING ISSUES.  
THIS CONSTITUTES "CRUEL AND UNUSAL PUNISHMENT".

(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:

ALL GROUND WERE PRESENTED

**Request for Relief**

15. State exactly what you want the court to do: RESPECTED JUDGE I AM REQUESTING  
TO HIGHER AUTHORITY TO IMMEDIATELY RELEASE FROM DHS CUSTODY  
I AM VERY GRATEFUL TO YOU.

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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:

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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: 04-22-2026

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*Signature of Petitioner*

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*Signature of Attorney or other authorized person, if any*