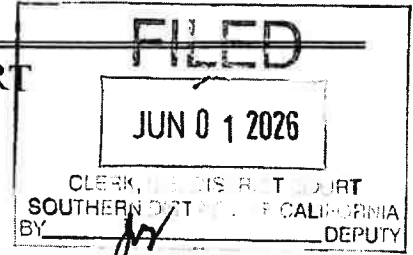


AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the
Southern District of California



Shakir Karimov

Petitioner

v.

Christopher J. Larose Senior Warden
Otay Mesa Detention Center and

Respondent

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

Case No. **'26CV3421 JO 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: Shakir Karimov
- (b) Other names you have used: _____
2. Place of confinement:
 - (a) Name of institution: Otay Mesa Detention Center
 - (b) Address: 7488 CALZADA DE LE FUENTE, SAN DIEGO CA 92154
- (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: Immigration Court Otay Mesa

7488 CALZADA DE LE FUENTE, SAN DIEGO CA 92154

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

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

Prolonged detention with no end in sight.

(d) Date of the decision or action: 10/06/2025

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: _____

being detained by ICE while applying for asylum

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: N/A _____

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: N/A _____

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: 10/06/2025

(b) Date of the removal or reinstatement order: _____

(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: Being illegally detained for a long time. I can not be detained for more than 180 days (6 month) under INA 241(a)(6). And principles ZADVYDAS v. DAVIS 2001.

The individual final court was set for April 22, 2026. But court date 5 times and judge changed without reason.

Exhibit 1- Passport and Exhibit 2- Birth certificate

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 Do not cite cases or law.):*

I have been detained in ICE custody since October 6, 2025 at Otay Mesa Detention center. (More than 7 month)

I have not been released on humanitarian parole. I also wrote a request to the ICE police for a humanitarian

parole. They replied that on May 12, 2026: "Your message will be forwarded to your DO". No response after that.

(Exhibit 3- The request to the ICE) When i came here, before 1 week i wrote an email 7 important adresses about about applying for asylum. Exhibit 7- Email to 7 addresses.

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

☐ Yes

☒ No

GROUND TWO: Having two sons and having elderly and sick parent who have not seen me for 1 and a half years.

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

I have 2 young children, ages 15 and 10. Who need my control, care and advice. I am very worried about my

eldest son being away from me for a long time. Because he sometimes comes home late, does not listen to his

mother's words and argues with her a lot. My illegal detention puts the lives of my children at risk. And i have sick

and elderly parents are seriously worried about me, who need my my special care. My father had a heart attack

and had heart surgery and my mother had implants places in both knees.

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

☐ Yes

☒ No

GROUND THREE: My preexisting health problems and new health problems (Exhibit 4- Medical report)

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

My Psychological condition is characterized by severe panic disorder and post-traumatic emotional dysfunction.

Diagnosis: Acute panic reactions in enclosed spaces: - Suffocation, sweating, heart palpitations, high level of anxiety and sense of risk. The doctors in detention confirmed this disease, and i take medication for anxiety every day. During my time in detention i had sinusitis and severe, constant pain in my back, left arm and head.

The cold conditioner was on every day. Our chairs and beds are made of iron. Mattresses and pillows disappears

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

☐ Yes

☒ No

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GROUND FOUR: Proof that i am not a flight and community risk.I had no criminal record any country and U.S.
I came to America with a sincere belief.

Exhibit 5- Employees comments and Exhibit 6- Sponsor letter

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

Answer to the flight risk reason: I have an American citizen a high-income sponsor. He has a family, child, business and a successful carrier, I will not create problems for my friend. He gave me a sponsor support affidavit letter for humanitarian parole.I have seen only America as a country in the world that fights dictator selflessly and works to restore justice in countries with unjust governments. 4. Answer to the Community risk reason: A) When i left my first job at the bank,more than 40 employees wrote to our work's whatsapp group that they were upset about my departure. B) I lived in a small room with people from 11 countries for more than 7 months in detention.

(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 the Humanitaran parole of Immigration Appeals cannot decide constitutional issues.

Request for Relief

15. State exactly what you want the court to do: I respectfully requested that my information be closed to the public and the court order my release on humanitarian parole from detention under INA 212(d)(5)(a). I am very respectfully requesting from The Federal Court to provide me with free federal lawyer support to help me and o complete my petition. Immediate release from detention under reasonable, humanitarian parole or any less restrictive alternative to confinement. I am attaching 7 exhibit (12 pages) in addition to this Habeas Corpus.

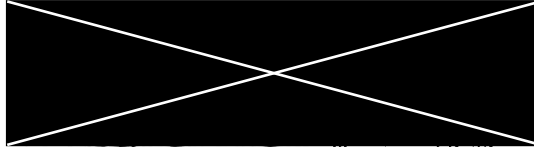
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Declaration Under Penalty Of Perjury

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: 05/21/2026

A black rectangular box with a white 'X' drawn across it, used to redact the signature of the petitioner.

Signature of Petitioner

Signature of Attorney or other authorized person, if any