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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

YAMRAJ KHADKA,

Petitioner,

vs.

MARKWAYNE MULLIN, Secretary, Department of Homeland Security; DAVID VENTURELLA, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement; NANCY GONZALEZ, Acting Director, Bakersfield, ICE Field Office; and CHRISTOPHER CHESTNUT, Warden, California City Correctional Facility; TODD BLANCHE, Acting Attorney General of the United States; Executive Office of Immigration Review,

Respondent(s)

Case No.:

PETITION FOR WRIT OF HABEAS CORPUS

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INTRODUCTION

1. Petitioner Yamraj Khadka is a native of Nepal who came to the United States fleeing persecution, repeated harm, and threats on account of his political beliefs and involvement in a political party.

2. Petitioner files this Petition for writ of habeas corpus seeking his immediate release from

the custody of the Department of Homeland Security (DHS), and an injunction preventing removal to a third country absent due process.

3. Petitioner was granted withholding of removal by an immigration judge on December 31, 2025. That order prevents his removal to Nepal.

4. It has now been over six months since that order took effect and Respondents have made no effort to remove Petitioner to a third country, let alone demonstrate a third country will accept him for removal.

5. Petitioner has established that the government is not reasonably likely to deport him from the United States in the near future, shifting the burden to the government to justify his prolonged detention.

6. Moreover, due process requires notice and opportunity for Petitioner to object to removal to a third country where he fears persecution and torture. Respondents have not identified any potential third country to which they seek to remove him, but in the event they do Petitioner is entitled to due process before he can be deported there.

7. Petitioner's detention, now nearly 18 months running, violates the Immigration and Nationality Act and his right to Due Process.

JURISDICTION

8. Petitioner is in the physical custody of Respondents at the California City Correctional Facility in California City, California.

9. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).

10. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

VENUE

11. Pursuant to *Braden v. 30th Judicial Circuit of Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Eastern District of California, the judicial district in which Petitioner currently is detained.

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12. Venue is also properly in this Court pursuant to 28 U.S.C § 1391(e) because Respondents are employees, officers, and agencies of the United States and because a substantial part of the events or omissions giving rise to the claims occurred in the Eastern District of California.

Contours Of 28 U.S.C. § 2243 Relief

13. The habeas statute requires that this Court adjudicate this case quickly. Upon receipt of the petition itself, the Court must either grant it or order Respondents to show cause "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Respondents must file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

14. Habeas corpus is "perhaps the most important writ known to the constitutional law . . . affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia,* 372 U.S. 391, 400 (1963) (emphasis added). "The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application." *Yong v. I.N.S.,* 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

15. Because habeas is fundamentally an equitable remedy, district courts have discretion to fashion appropriate relief. *Burnett v. Lampert*, 432 F.3d 996, 999 (9th Cir. 2005) (federal courts have "a fair amount of flexibility" in fashioning specific habeas relief). This is particularly the case where constitutional rights are at issue. *Roman v. Wolf,* 977 F.3d 935, 942 (9th Cir. 2020) (where the basis for relief is a constitutional violation, "the scope of a district court's equitable powers to remedy past wrongs is broad.").

16. Federal district courts have "the inherent authority to grant bail pending resolution of a habeas petition in the immigration context." *Perdomo v. Noem*, No. 2:25-CV-05605-MEMF-SP, 2025 WL 3050056, at *4 (C.D. Cal. July 30, 2025) (collecting cases). District courts within this Circuit and others have consistently exercised their authority to make bond determinations in immigration cases. *Id.*; *Soriano v. Hernandez*, No. 2:26-CV-00900-DGE, 2026 WL 969764, at *6 (W.D. Wash. Apr. 10, 2026); *Miri v. Bondi*, No. 5:26-CV-00698-MEMF-MAR, 2026 WL 622302, at *12 (C.D. Cal. Mar. 5, 2026); *Zheng v. Albarran*, No. 1:25-cv-01685-DJC-CKD, 2025 WL 3640676 (E.D. Cal. Dec. 16, 2025);

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Zepeda Rivas v. Jennings, 465 F. Supp. 3d 1028, 1036 (N.D. Cal. 2020); *L.G.M. v. Larocco*, No. 25-CV-2631-PKC, 2025 WL 2173577 (E.D.N.Y. July 31, 2025); *Leslie v. Holder*, 865 F.Supp.2d 627, 633 (M.D. Pa. 2012); *Flores-Powell v. Chadbourne*, 677 F. Supp. 2d 455, 477 (D. Mass. 2010); *Ramirez v. Watkins*, No. CIV.A. B:10-126, 2010 WL 6269226, at *17-19 (S.D. Tex. Nov. 3, 2010).

PARTIES

17. Petitioner Yamraj Khadka is a citizen of Nepal. He is currently detained at the California City Correctional Facility.

18. Respondent Markwayne Mullin is the Secretary of the Department of Homeland Security. He is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees Immigration and Customs Enforcement ("ICE"), which is responsible for Petitioner's detention. He has ultimate custodial authority over Petitioner and is sued in his official capacity.

19. Respondent David Venturella is the Acting Director of Immigration and Customs Enforcement (ICE). ICE is responsible for Petitioner's detention. As such, he is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

20. Respondent Nancy Gonzalez is Acting Director, Bakersfield, ICE Field Office, Enforcement and Removal Operations Division. As such, Respondent Gonzalez is also Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. She is named in her official capacity.

21. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

22. Respondent Christopher Chestnut is employed by CoreCivic as Warden of the California City Correctional Facility, where Petitioner is detained. He has immediate physical custody of Petitioner. He is sued in his official capacity.

23. Respondent Todd Blanche is the Acting Attorney General of the United States. He is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. He is sued in his official capacity.

24. Respondent Executive Office for Immigration Review (EOIR) is the federal agency

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within the Department of Justice responsible for implementing and enforcing the INA and related statutes in removal proceedings. It also oversees the Immigration Courts, employing Immigration Judges to adjudicate immigration cases.

FACTUAL ALLEGATIONS

25. Petitioner was born [redacted] in Rukum (Eastern), Nepal, and entered the United States without inspection on or about January 5, 2025, near San Ysidro, California. Immigration officials immediately arrested him and detained him at the Otay Mesa Detention Center in San Diego, California. ICE later transferred him to the California City Correctional Facility on or about February 22, 2026, where he remains now. Mr. Khadka has no criminal history in Nepal or the United States, and has a grand-uncle through his mother, Bharilal Khatry Chhetry, a United States citizen who resides in Round Rock, Texas, with whom Petitioner intends to reside upon release, along with Mr. Chhetry's family. Khadka Decl. ¶¶ 5, 10, 12.

26. On January 6, 2025, U.S. Customs and Border Protection issued an expedited removal order finding Petitioner inadmissible under INA §§ 212(a)(7)(A)(i)(I) and 212(a)(6)(A)(i). Petitioner expressed a fear of return to Nepal and was referred for a credible fear screening. On March 21, 2025, a USCIS asylum officer conducted a telephonic credible fear interview with Mr. Khadka at the Otay Mesa Detention Center and issued a positive credible fear determination; the Section 235(b)(1) expedited removal order was thereafter vacated pursuant to 8 C.F.R. § 208.30. On March 23, 2025, ICE issued Mr. Khadka a Notice to Appear, placing him in full removal proceedings before the San Diego (Otay Mesa) Immigration Court. Khadka Decl. ¶ 6; Ramnaney Decl. ¶ 4, Exh. B.

27. At his March 21, 2025, credible fear interview, Mr. Khadka indicated his intended destination upon release was in Austin, Texas. If released, Mr. Khadka intends to reside with his granduncle through his mother's family, Bharilal Khatry Chhetry, a United States citizen who resides with his family in Round Rock, Texas. Ramnaney Decl. ¶ 4, Exh. B.

28. Petitioner filed an application for asylum, withholding of removal, and protection under the Convention Against Torture before the San Diego Immigration Court on November 12, 2025. His application alleged past persecution and well-founded fear of future persecution in Nepal on account of his political opinion as an active member and supporter of the Nepali Congress Party and its student

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wing, the Nepal Student Union ("NSU"), which he formally joined on July 3, 2023. Between 2022 and 2024, [redacted] subjected Mr. Khadka to a series of escalating attacks: [redacted] Each time Mr. Khadka or his family reported these incidents to the police, the police refused to act, characterizing the violence as a political matter. Khadka Decl. ¶¶ 3-4; Ramnaney Decl. ¶ 4, Exh. B.

29. Following the [redacted] 2024, death threat, Petitioner fled Nepal on April 15, 2024. He traveled through Dubai, Uzbekistan, Tajikistan, Brazil, Bolivia, Peru, Ecuador, Colombia, Panama (including a multi-day crossing of the Darién Gap jungle, where he was fingerprinted and processed by Panamanian authorities for immigration status), Costa Rica, Nicaragua, Honduras (where he was again fingerprinted for immigration status and ordered to leave the country within 24 hours), Guatemala, and Mexico. In Mexico City, Mr. Khadka was kidnapped by a criminal organization, held in captivity for seven days, physically abused, deprived of adequate food and water, and extorted for $2,600 before being released. Approximately two days before he reached the United States border, [redacted] attacked his family home in Nepal with stones at night and relayed a message through his father that they would find him wherever he was hiding and kill him. Petitioner entered the United States without inspection on or about January 5, 2025. Khadka Decl. ¶¶ 4, 11.

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30. Mr. Khadka's initial master calendar hearing was held on April 3, 2025 before Immigration Judge Meghan E. Heesch at the San Diego (Otay Mesa) Immigration Court. The case was continued through multiple hearing dates while the parties prepared for the merits hearing. Prior counsel, Khagendra Gharti-Chhetry, Esq., of Chhetry & Associates, P.C., New York, New York, represented Mr. Khadka throughout the Immigration Court proceedings.

31. The individual merits hearing on Mr. Khadka's asylum application was ultimately scheduled for and held on December 31, 2025, at 8:30 a.m. before IJ Heesch. Ramnaney Decl. ¶ 4, Exh. B.

32. On December 31, 2025, the Otay Mesa Immigration Court issued an order denying Mr. Khadka's application for asylum on the ground that he had not established an exception to the circumvention-of-lawful-pathways bar, 8 C.F.R. § 1208.33, but granting him withholding of removal to Nepal. Ramnaney Decl., Exh. A. Both ICE and Petitioner waived any appeal of the order on the day it was issued, rendering it final.

33. On or about February 22, 2026, ICE transferred Mr. Khadka to the California City Correctional Facility.

34. On or about March 31, 2026, 90 days after an Immigration Judge awarded him withholding of removal to Nepal, ICE was required to provide Petitioner a custody review to determine if he could be released on an order of supervision, 8 U.S.C. § 1231(a)(6), which it never did.

35. On or about April 20, 2026, Mr. Khadka appeared before an Immigration Judge for a bond hearing. The Immigration Judge denied the request on the ground that the court lacked jurisdiction to conduct a bond hearing because Mr. Khadka is detained pursuant to 8 U.S.C. § 1231(a). The Immigration Judge made not determination as to whether Mr. Khadka poses a danger to the community or a flight risk.

36. On June 23, 2026, well over 170 days after the Immigration Court's final order, ICE provided Mr. Khadka a custody review. At the custody review interview, Mr. Khadka responded to a series of questions from an unknown ICE Deportation Officer. Counsel had already filed a Form G-28 and transmitted it to ICE on June 5, 2026, and intended to participate in any custody review proceedings or interviews. ICE nevertheless conducted the interview without counsel present and without providing

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counsel an opportunity to appear, participate, or advise Mr. Khadka. Because counsel was excluded from the interview, counsel cannot fully describe what occurred. Based on information currently available, counsel understands that ICE conducted a standard custody review interview and questioned Mr. Khadka regarding his continued detention, release plan, and proposed sponsor. Ramnaney Decl. ¶ 7.

37. In response to questions from ICE about his community ties in the U.S., Mr. Khadka identified his granduncle, Bharilal Khatry Chhetry, a United States citizen who resides with his family in Round Rock, Texas, and who is prepared to host Mr. Khadka upon his release. Khadka Decl. ¶ 12.

38. No decision on whether to release Mr. Khadka has been issued as of the date of this filing. Ramnaney Decl. ¶ 9.

39. On June 30, 2026, Mr. Khadka reached six months of detention post the Immigration Court's final order granting him withholding of removal.

40. Through this Petition Mr. Khadka seeks immediate release under appropriate conditions of supervision given the Constitutional issues at stake. See *Zadvydas v. Davis*, 533 U.S. 678, 699-700 (2001) (citing 8 U.S.C. § 1231(a)(3)) ("If the alien does not leave or is not removed within the removal period, the alien, pending removal, shall be subject to supervision under regulations prescribed by the Attorney General."); *Kim Ho Ma v. Ashcroft*, 257 F.3d 1095, 1105 (9th Cir. 2001); *Nadarajah v. Gonzales*, 443 F.3d 1069, 1082 (9th Cir. 2006)[1]; *Abduvakhidov v. Warden, Golden State Annex Det. Facility*, No. 1:25-CV-01060-EPG-HC, 2026 WL 1298157, at *8 (E.D. Cal. May 12, 2026) (granting immediate release of noncitizen ordered removed but granted withholding of removal to his native country, subject to "appropriate conditions of supervision set forth in 8 C.F.R. § 241.5"); *Arafat v. Mullin*, No. 1:26-cv-04107-DC-CKD (E.D. Cal. June 18, 2026) (same, E.D. Cal., same facility).

CLAIMS FOR RELIEF

COUNT ONE

Violation of 8 U.S.C. § 1231(a)(6) and Due Process

41. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in

[1] In *Ma v. Ashcroft*, 257 F.3d 1095, 1105 (9th Cir. 2001) (on remand from *Zadvydas v. Davis*, 533 U.S. 678, 696 (2001)) and *Nadarajah v. Gonzales*, 443 F.3d 1069, 1082 (9th Cir. 2006), the Court granted petitioners' release without requiring a bond hearing.

the preceding paragraphs as if fully set forth herein.

42. The Immigration and Nationality Act ("INA"), at 8 U.S.C. § 1231, provides that during a specified ninety-day, post order removal period, "the Attorney General shall detain the alien." 8 U.S.C. § 1231(a)(1)(A), (a)(2)(A).

43. That removal period began when Petitioner's removal order became administratively final, on December 31, 2025, when both parties waived any appeal. 8 U.S.C. § 1231(a)(1)(B)(i); 8 C.F.R. § 1241.1(b). That ninety-day mandatory detention period has long since passed.

44. After the ninety-day period, INA section 1231 is clear about what happens next—"If the alien . . . is not removed within the removal period, the alien, pending removal, shall be subject to supervision under regulations prescribed by the Attorney General." *Id.* (a)(3) (emphasis added).

45. There are limited circumstances under which a noncitizen may be detained beyond the ninety-day removal period. *Johnson v. Arteaga-Martinez*, 596 U.S. 573, 575 (2022). "After the removal period expires, the government 'may' detain only four categories of people: (1) those who are 'inadmissible' on certain specified grounds; (2) those who are 'removable' on certain specified grounds; (3) those it determines 'to be a risk to the community'; and (4) those it determines to be 'unlikely to comply with the order of removal.'" *Id.*; see also 8 C.F.R. § 241.4 (identifying criteria for release under supervision).

46. The INA, as interpreted by caselaw, also authorizes a post-removal-period of detention of up to six months to allow the government to effectuate removal from the United States. 8 U.S.C. § 1231(a)(6). *Zadvydas*, 533 U.S. 678. "In Zadvydas, the Court construed § 1231(a)(6) to mean that an alien who has been ordered removed may not be detained beyond 'a period reasonably necessary to secure removal,' and it further held that six months is a presumptively reasonable period." *Jennings v. Rodriguez*, 583 U.S. 281, 298-99 (2018) (internal citations omitted).

47. However, the "six-month presumption of reasonability under *Zadvydas* is 'just that—a presumption.'" *Burunsuzyan v. Noem*, No. 5:26-CV-00049-RGK-AGR, 2026 WL 246067, at *5 (C.D. Cal. Jan. 27, 2026) (quoting *Clark v. Martinez*, 543 U.S. 371, 387 (2005) (O'Connor, J., concurring)). "Such a presumption is not a 'prohibition on claims challenging detention less than six months.'" *Burunsuzyan*, 2026 WL 246067, at *5 (quoting *Hoang Trinh v. Homan*, 333 F. Supp. 3d 984, 993 (C.D.

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Cal. 2018)). "Multiple district courts have found that the six-month presumption is rebuttable." *Ndandu v. Noem*, No. 3:25-CV-02939-RBM-MSB, 2026 WL 25848, at *3 (S.D. Cal. Jan. 5, 2026) (collecting cases).

48. Thus, after the ninety-day removal period has run, and once removal is no longer foreseeable, it is a violation of 8 U.S.C. § 1231(a)(6) and Due Process to hold a noncitizen in immigration detention.

49. *Zadvydas* places the burden on the non-citizen to show that there is "good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." *Pelich v. I.N.S.*, 329 F.3d 1057, 1059 (9th Cir. 2003). Once the non-citizen does so, the burden shifts to the government to justify further detention.

50. Here, Petitioner has been detained past the ninety-day removal period, and now over six months post final order. Petitioner cannot be removed to his native country Nepal, and there are no indicia that he has ties to any other country. Nor is there any evidence that Respondents have taken any steps to attempt to deport him, let alone that another country has agreed to take him. All of this shows that Mr. Khadka has met his burden of demonstrating that his deportation is not reasonably likely in the near future.

51. Based on the foregoing, Petitioner's continued detention is unreasonable and a violation of 8 U.S.C. § 1231(a)(6) and Due Process.

52. Given the constitutional issues at stake, the Court should order immediate release under appropriate conditions of supervision as set forth in 8 C.F.R. § 241.5. See *Zadvydas*, 533 U.S. at 696; *Kim Ho Ma*, 257 F.3d at 1105; *Nadarajah*, 443 F.3d at 1082.

53. In granting release, to the extent the Court determines bond is necessary, it should require minimal bond of $1,500. 8 U.S.C. § 1226(a)(2).

COUNT TWO

Third Country Removal in Violation of Due Process

54. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

55. Under the Due Process Clause of the Fifth Amendment to the United States Constitution,

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no person shall be "deprived of life, liberty, or property, without due process of law." U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects." *Zadvydas*, 533 U.S. at 690.

56. Due Process requires notice and an opportunity to respond before Petitioner is removed to a third country. *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 320 (1950).

57. "Failing to notify individuals who are subject to deportation that they have the right to apply ... for withholding of deportation to the country to which they will be deported violates both INS regulations and the constitutional right to due process." *Andriasian v. I.N.S.*, 180 F.3d 1033, 1041 (9th Cir. 1999); *A.A.M. v. Andrews*, 815 F. Supp. 3d 1124, 1134 (E.D. Cal. 2025) (outlining what process is due noncitizens seeking to adjudicate a fear-based claim before removal to a third country).

58. The asylum statute bars removal to any country where an individual faces a well-founded fear of persecution. 8 U.S.C. § 1158. The withholding of removal statute bars removal to any country where an individual faces a clear probability of persecution. 8 U.S.C. § 1231(b)(3). Article III of the Convention Against Torture bars the removal of any individual to a country where they face a clear probability of torture.

59. Removing Petitioner to a third country without notice and the opportunity to apply for protection from removal violates Due Process, the Immigration and Nationality Act, and Article III of the Convention Against Torture.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

a. Assume jurisdiction over this matter;

b. Order that Petitioner shall not be transferred outside of the Eastern District of California while this petition is pending;

c. Declare that Petitioner's detention is unlawful;

d. Order that Petitioner be released immediately from detention under appropriate conditions of supervision as set forth in 8 C.F.R. § 241.5, with any bond set at a minimal $1,500, 8 U.S.C. § 1226(a)(2);

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e. Enjoin Respondent from removing Petitioner to a third country absent notice and an opportunity for him to apply for protection from persecution and torture under the asylum statute, the withholding of removal statute, or the Convention Against Torture in compliance with due process, including but not limited to: (i) provide Petitioner and his counsel with written notice in a language Petitioner can understand; (ii) provide Petitioner and his counsel a minimum of fourteen (14) days to raise a fear-based claim for protection prior to removal; and (iii) if Petitioner does assert a fear-based claim, Respondents must provide Petitioner a meaningful opportunity to be heard on his fear-based claim before a neutral decisionmaker in compliance with due process;

f. Enjoin Respondent from re-detaining Petitioner without affording him a hearing before this Court or another neutral decisionmaker where Respondents have the burden of proving by clear and convincing evidence that re-detention is warranted;

g. Award reasonable costs and attorney's fees; and

h. Grant such further relief as the Court deems just and proper.

Date: July 7, 2026

Harbor Justice Law, APC

By: Nikhil Ramnaney

Nikhil Ramnaney
Attorney for Petitioner

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VERIFICATION

I, Nikhil Ramnaney, am the attorney of record for the Petitioner Yamraj Khadka. I verify that the factual statements made in the foregoing Petition of Writ of Habeas Corpus are true and correct to the best of my knowledge, information and belief.

Executed this 7th day of July 2026.

Harbor Justice Law, APC

By: /s/ Nikhil Ramnaney
Nikhil Ramnaney
Attorney for Petitioner

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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California, over the age of 18, and not a party to the within action. My business address is 2485 Atlantic Avenue, Long Beach, California 90806.

On the date below, I served the following document(s) described as:

- **PETITION FOR HABEAS CORPUS**
- **CIVIL CASE COVER SHEET**

On the following interested parties:

U.S. Attorney's Office
Department of Justice
usacae.ecf2241-imm@usdoj.gove

Cheri Buxbaum
U.S. Department of Justice
Cheri.Buxbaum@usdoj.gov

☒: **By Electronic Mail** – serving the enclosed documents via e-mail transmission to each of the parties referenced above to the email(s) referenced above.

I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 7, 2026, in Long Beach, California.

Signature: Nikhil Ramnaney
Nikhil Ramnaney