

JUL 16 2026

UNITED STATES DISTRICT COURT
for the

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature] DEPUTY CLERK

Kamysbayeva Maussym
Petitioner

v.

EP 26 CV 1921

Case No. A# [Redacted]
(Supplied by Clerk of Court)

Department of Homeland Security
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: Kamysbayeva Maussym
(b) Other names you have used: _____
2. Place of confinement:
(a) Name of institution: EL PASO Processing Center
(b) Address: 8915 Montana Ave
EL PASO TX 79925
(c) Your identification number: A# [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: N/A
(b) Docket number of criminal case: N/A
(c) Date of sentencing: N/A
☒ 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)

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

- ☐ 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): N/A

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: Department of Homeland Security(b) Docket number, case number, or opinion number: A# [REDACTED]

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

I am asking the Judge to consider my case and grant me the possibility of a bond hearing.

(d) Date of the decision or action: _____

Your Earlier Challenges of the Decision or Action7. **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: N/A(2) Date of filing: N/A(3) Docket number, case number, or opinion number: N/A(4) Result: N/A(5) Date of result: N/A(6) Issues raised: N/A(b) If you answered "No," explain why you did not appeal: N/A8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☒ No

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

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: N/A(2) Date of filing: N/A(3) Docket number, case number, or opinion number: N/A(4) Result: N/A(5) Date of result: N/A(6) Issues raised: N/A(b) If you answered "No," explain why you did not file a second appeal: N/A9. **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: N/A(3) Docket number, case number, or opinion number: N/A(4) Result: N/A(5) Date of result: N/A(6) Issues raised: N/A(b) If you answered "No," explain why you did not file a third appeal: N/A10. **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

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

If "Yes," provide:

(1) Name of court: N/A(2) Case number: N/A(3) Date of filing: N/A(4) Result: N/A(5) Date of result: N/A(6) Issues raised: N/A

- (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: N/A(2) Case number: N/A(3) Date of filing: N/A(4) Result: N/A(5) Date of result: N/A(6) Issues raised: N/A

- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: N/A

11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

☒ Yes☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 12/05/2025(b) Date of the removal or reinstatement order: N/A

(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes☒ No

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

If "Yes," provide:

- (1) Date of filing: N/A
- (2) Case number: N/A
- (3) Result: N/A
- (4) Date of result: N/A
- (5) Issues raised: N/A

- (d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes☒ No

If "Yes," provide:

- (1) Name of court: N/A
- (2) Date of filing: N/A
- (3) Case number: N/A
- (4) Result: N/A
- (5) Date of result: N/A
- (6) Issues raised: N/A

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: N/A
- (b) Name of the authority, agency, or court: N/A
- (c) Date of filing: N/A
- (d) Docket number, case number, or opinion number: N/A
- (e) Result: N/A
- (f) Date of result: N/A
- (g) Issues raised: N/A

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: My continued detention is causing ongoing and escalating emotional and psychological harm to my minor children. A licensed medical provider has issued a formal referral for psychological evaluation due to observed emotional distress.

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

The children have experienced worsening anxiety, sleep disruption, and difficulty functioning in daily life since my detention. My family is actively seeking a qualified Russian-speaking child psychologist so my children can receive appropriate mental health support in a language they fully understand.

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

☐ Yes

☒ No

GROUND TWO: I continue to pursue my immigration case in good faith. I am obtaining essential documentary evidence from Kazakhstan through attorney-submitted requests. These records are material to my case, and the delay in receiving them is beyond my control.

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

Before my detention, I was part of my husband's immigration proceedings. After my detention, my case was separated from his proceedings. The same documentary evidence from Kazakhstan is important to both of our immigration cases. My husband's final hearing, originally scheduled for June 22, 2026, was continued to November 14, 2029, due to the need to obtain and review this evidence.

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

☐ Yes

☒ No

GROUND THREE: I have remained in immigration detention since December 5, 2025. My prolonged detention has caused continued family separation, substantial emotional hardship, and significant prejudice to my ability to pursue my immigration case.

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

I respectfully submit that the length and circumstances of my detention raise serious due process concerns and request that this court review the legality and continued justification of my detention.

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

☐ Yes

☒ No

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

GROUND FOUR: The conditions of detention are restrictive and have a negative impact on my physical and emotional well-being. Poor quality of food, as well as the overall detention environment, is also causing harm to my health.

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

Access to family communication and legal assistance is limited, which increase stress and makes it difficult to properly participate in my immigration proceedings. Overall these conditions, combined with the uncertainty of my case, negatively affect my mental and physical health.

(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:

N/A

Request for Relief

15. State exactly what you want the court to do: I respectfully request that the Court order my release from immigration detention or grant me a bond hearing before an immigration judge.

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

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

07/13/2026

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: 07/13/2026



Signature of Petitioner

Signature of Attorney or other authorized person, if any