

Abhishek Rashmi Shah
Petitioner

OCT 20 2025

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY JP DEPUTY

Don Jones [commander at kay county detention center]
Chuck Coeppel [captain of kay county detention center]
Trent Becker [Immigration and customs enforcement officer]
Immigration and Customs Enforcement

Case No. CV-25-1238-D

PETITION FOR WRIT OF HABEAS CORPUS UNDER U.S.C. 2241
I PARTIES

my name is Abhishek Rashmi Shah. I am currently detained
at Kay county detention center, 1101 W DRY Road NEWKIRK, OK 74647

Petitioner
Respondent

The respondent(s) here are Commander and Captain of Kay County detention center and I am a Federal I.C.E. detainee at this Facility. The above mentioned respondents have custody over me.

II JURISDICTION

This court has jurisdiction under 28 U.S.C. 2241 because I am in custody in this district under federal immigration authority.

III STATEMENT OF FACTS

I am an immigration detainee. I was ordered removed on 06/13/2025. I am detained since 04/08/2025. I did not timely file an appeal with BIA. I am detained for more than 90 days since the removal order became final. I.C.E. has not removed me despite of fully co-operating with their removal proceeding. There is no significant likelihood of removal in the reasonably foreseeable future. I am an Indian National and since Apr^l 2025 I have been transferred to 7 (seven) different states under I.C.E. custody.

P.T.O.

IV LEGAL CLAIM

Under *Zadvydas v. Davis*, 533 U.S. 678 (2001), immigration detention is limited to 90 days after a final order of removal. Continued detention beyond this period violates my rights under U.S. constitution (Due process clause of the fifth Amendment.).

V RELIEF REQUESTED

I respectfully ask this court to:

Grant my Petition for writ of Habeas Corpus.

Please order my release from detention under appropriate supervision.

VI DECLARATION

I declare under penalty of Perjury that the above is true and correct.

09/26/2025

Abhishek Shah

Abhishek Rashmi Shah

1101 W DRY ROAD

NEWKIRK, OK 74647