

FILED

DEC 02 2025

Name / Nombre:

Carlos Alberto RinconCLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY [Signature]
DEPUTY CLERK

A Number / Número A:



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Golden State Annex611 Frontage Rd McFarland CA 93250**PRO SE****UNITED STATES DISTRICT COURT****FOR THE EASTERN DISTRICT OF CALIFORNIA**Carlos AlbertoRincon Nino

[Full Name / Nombre Completo]

Petitioner,

v.

1:25CV01714 TLN-JDP

Case No. _____

Warden of the Golden State Annex
 Detention Facility, Current or Acting Field
 Office Director, San Francisco Field Office,
 United States Immigration and Customs
 Enforcement; Current or Acting Director,
 United States Immigration and Customs
 Enforcement; Current or Acting Secretary,
 United States Department of Homeland
 Security; and Current or Acting United States
 Attorney General,

**Motion for Appointment of Counsel
 Pursuant to 18 U.S.C. § 3006A**

Respondents.

Petitioner [your name / su nombre] Carlos Alberto Rincon Nino has

filed a petition for writ of habeas corpus under 28 U.S.C. § 2241 challenging Petitioner's
 indefinite detention by Respondents. Petitioner was detained by Immigration and Customs

1 Enforcement (ICE) on or about [date / *el mes y año en que comenzó su detención por ICE*]

2 June 2025. Petitioner has remained in ICE custody since that date.

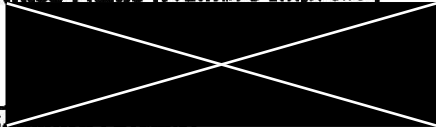
3 Petitioner's removal proceedings remain pending.

4 The concurrently filed petition for writ of habeas corpus sets forth Petitioner's eligibility
5 for a writ of habeas corpus ordering Petitioner's release.

6 Petitioner moves the Court to appoint counsel to represent Petitioner in this case. The
7 Court may appoint counsel in a habeas action when the "interests of justices so require." 18
8 U.S.C. § 3006A(a)(2)(B). Here, Petitioner has a strong chance of success on the merits as
9 explained in the concurrently filed petition for writ of habeas corpus. However, given the
10 complexity of the law on immigration detention and Petitioner's status as a detained immigrant,
11 Petitioner would have great difficulty presenting the case without the assistance of counsel. For
12 these reasons, Petitioner respectfully requests that the Court appoint counsel.

13
14
15 11-24-2025
16 Date [*Fecha*]

Carlos Alberto Rincon Nino
Printed Name [*Nombre Impreso*]

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Signature [*Firma*]