IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
MAR -5 2026
JEFFREY P. COLWELL
CLERK

Civil Action No. _____
(To be supplied by the court)

KUMAR, LALENDRA SAH, Applicant,

v. TODD M LYONS. Acting Director. ICE
Robert Guadian. Field Director. Denver
Juan Baltazar. WARDEN, Respondent.
(Name of warden, superintendent, jailer, or other custodian)

(Note: If you are attacking the validity of a state conviction or sentence and not the execution of your sentence, you must file an application for a writ of habeas corpus pursuant to 28 U.S.C. § 2254. If you are attacking the validity of a judgment entered in a federal court, you must file a motion pursuant to 28 U.S.C. § 2255 in the federal court that entered the judgment.)

APPLICATION FOR A WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

A. APPLICANT INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

KUMAR, LALENDRA SAH, [redacted]
(Applicant's name, prisoner identification number, and complete mailing address)

3130 North Oakland Street. Aurora, CO 80010 A2-107

Indicate whether you are a prisoner or other confined person as follows: (check one)

___ Pretrial detainee
___ Civilly committed detainee
X Immigration detainee
___ Convicted and sentenced state prisoner
___ Convicted and sentenced federal prisoner
___ Other: (*Please explain*) _____

B. RESPONDENT INFORMATION

TODD M. LYONS . Robert Guadian . Juan Baltazar
(Respondent's name and complete mailing address)

C. STATEMENT OF CLAIMS

State clearly and concisely every claim you are asserting in this action. For each claim, specify the right that allegedly has been violated and all facts that support your claim. If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "C. STATEMENT OF CLAIMS."

CLAIM ONE: Being in ICE custody for 3 months without due process.

Supporting facts:

I am a Citizen of NEPAL, who entered in U.S.A. on 04/09/2023 through Arizona border. I was arrested by Border Patrol and I was sent to a detention center in Arizona. After 3 days, ICE released me on supervision and I have to report to ICE every year. On 09/15/2025 while I was working in a Gas station I was arrested by the local Police for an incident related to an attack from someone Trying to rob the place. After 5 days in jail the Judge release me but I was arrested by ICE (I was working in New Jersey) and sent me to a detention center (Charly Detention Center).

Continue pag 2 "C. Statement of Claims"

Claim 2:

I was transfered from New Jersey to Louisiana, them to "El Paso" texas and after that, I was transfered to Aurora ICE detention Center on 09/30/2025.

I was in Court on 10/20/2025 and I was told by the Judge to find a lawyer and gave another day in court.

Since 10/20/2025, I have been in ICE custody without having a date in Court. I was supposed to be in court on 12/30/2025 but it was postponed to Jan, 12, 2026. I got a letter with a new date, 01/27/2026. The date was postponed again to 02/17/2026 and postponed again to 02/23/2026. This date I wasn't seen by the Judge and I was sent to the unit again.

Claim 3: I have been 146 days in Aurora ICE Processing Center deprivated of my liberty without the constitutional Right to the DUE Process. My constitutional Rights have been violated and I believe I should be released from ICE custody.

D. PRIOR APPLICATIONS

Have you ever filed a lawsuit, other than this lawsuit, in any federal court in which you raised or could have raised the claim(s) raised in this action? ___ Yes X No (*check one*).

If your answer is "Yes," complete this section of the form. If you have filed more than one prior application, use additional paper to provide the requested information for each prior application. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "D. PRIOR APPLICATIONS."

Name and location of court: _____

Case number: _____

Type of proceeding: _____

List the claim(s) raised: _____

Date and result: (Attach a copy of the decision if available) _____

Result on appeal, if appealed: _____

E. ADMINISTRATIVE REMEDIES

WARNING: You must exhaust administrative and/or state remedies before filing an action in federal court pursuant to 28 U.S.C. § 2241. Your case may be dismissed if you have not exhausted administrative and/or state remedies. If additional space is needed to explain exhaustion, use extra paper to do so. Please indicate that additional paper is attached and label the additional pages regarding exhaustion as "E. ADMINISTRATIVE REMEDIES."

Explain the steps you have taken to exhaust administrative and/or state remedies:

I have done everything available to me but the communication with ICE is very poor in this place.

F. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF."

I request to the court to order my immediate release from ICE custody. I want to continue my case in liberty.

G. APPLICANT'S SIGNATURE

I declare under penalty of perjury that I am the applicant in this action, that I have read this application, and that the information in this application is true and correct. *See* 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this application: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the application otherwise complies with the requirements of Rule 11.

(Applicant's signature)

02/24/2026
(Date)

(Form Revised December 2017)