UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

Mounish Kukatla Petitioner-Plaintiff, v. **David Venturella,** Acting ICE Director U.S. Immigration and Customs Enforcement; **Facility Warden** South Texas Ice Processing Cente Respondents-Defendants	Civ. No. 5:26-cv-04191 DHS File Number: [redacted]

EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

I. INTRODUCTION

Petitioner **Mounish Kukatla** is a native and citizen of India who was lawfully admitted to the United States on or about **December 2, 2015**, in **F-2 dependent status**. Since that time, Petitioner has continuously resided in the United States and has established substantial family, business, financial, and community ties. He is married, the father of a United States citizen child, owns a residence in San Antonio, Texas, operates and manages **Sarit Solutions LLC**, has consistently filed federal income tax returns, has maintained lawful immigration status for significant periods of time, has a verified residential address, and has substantial financial obligations in the United States. **His lawful admission into the United States is documented by his passport, F-2 visa, and I-94 admission record reflecting his lawful entry on December 2, 2015.**

On or about **May 11, 2026,** Petitioner was arrested for an allegation of **Public Intoxication** in Seguin, Texas, which ultimately resulted in his detention by U.S. Immigration and Customs Enforcement ("ICE"). Petitioner entered a plea of **no contest,** and the Municipal Court entered a **Deferred Disposition,** deferring the imposition of any conviction upon compliance with the court's conditions. Accordingly, Petitioner has not sustained a final criminal conviction arising from this incident, and the case remains subject to dismissal upon his successful completion of the deferred disposition. **Following his arrest, Petitioner was transferred to the South Texas Detention Complex, located at 566 Veterans Drive, Pearsall, Texas 78061, where he remains detained by ICE pending the resolution of his removal proceedings.**

Petitioner is the beneficiary of a **pending Form I-918, Petition for U Nonimmigrant Status.** On **November 16, 2022,** U.S. Citizenship and Immigration Services ("USCIS") issued Petitioner a **Bona Fide Determination ("BFD"),** finding that his U Visa petition is bona fide and exercising favorable discretion by granting him **deferred action and employment authorization.** USCIS's determination demonstrates that Petitioner is precisely the type of vulnerable crime victim whom Congress intended to protect through the U Visa program. Petitioner's U Visa petition arises from his victimization during an **armed robbery,** which caused significant emotional trauma. Since that incident, Petitioner has received ongoing medical treatment for **anxiety and depression** related to the armed robbery and continues to require medication and medical care. His continued detention disrupts that treatment and is inconsistent with the humanitarian protections afforded to bona fide U Visa petitioners.

Additionally, Petitioner is **statutorily eligible to pursue Cancellation of Removal pursuant to INA § 240A(b) (8 U.S.C. § 1229b(b))** and intends to seek that relief in his removal

proceedings. Petitioner is currently represented by experienced immigration counsel before the Immigration Court, where he is actively defending against removal. Through counsel, Petitioner intends to fully pursue all forms of immigration relief for which he is eligible, including **Cancellation of Removal pursuant to INA § 240A(b)** while continuing to pursue his pending **Form I-918, Petition for U Nonimmigrant Status**. Petitioner's retention of counsel and active participation in his removal proceedings demonstrate his commitment to fully complying with the immigration process and appearing at all future hearings.

Furthermore, the federal district court's nationwide injunction in **ICWC v. Noem** protects individuals with pending U Visa petitions and requires DHS and ICE to return to victim-centered enforcement practices. Petitioner's continued detention is inconsistent with those protections and undermines USCIS's prior favorable exercise of discretion in granting him deferred action and employment authorization.

Despite Petitioner's lawful admission into the United States, more than ten years of continuous physical presence, extensive family, business, and community ties, ownership of a residence and business, pending U Visa petition with a favorable Bona Fide Determination, documented ongoing medical treatment resulting from the violent crime that forms the basis of his U Visa petition, eligibility for **Cancellation of Removal**, representation by immigration counsel actively litigating his removal case before the Immigration Court, absence of any final criminal conviction, and the lack of any individualized custody determination consistent with due process, ICE continues to detain Petitioner. His continued confinement is arbitrary, punitive in effect, and in violation of the Due Process Clause of the Fifth Amendment. Petitioner therefore respectfully

seeks immediate release from custody or, in the alternative, a constitutionally adequate bond hearing.

II. JURISDICTION & VENUE

1. This Court has jurisdiction pursuant to:

   • 28 U.S.C. § 2241;

   • 28 U.S.C. § 1331;

   • 28 U.S.C. §§ 2201–2202; and

   • the Fifth Amendment to the United States Constitution.

2. Habeas jurisdiction exists because Petitioner is "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3).
3. Venue is proper in the **Western District of Texas** because Petitioner, **Mounish Kukatla,** is detained by U.S. Immigration and Customs Enforcement ("ICE") within this District and is currently confined at the **South Texas Detention Complex,** located at **566 Veterans Drive, Pearsall, Texas 78061.**

III. PARTIES

1. **Petitioner Mounish Kukatla, A#** [redacted], is a native and citizen of India currently detained by U.S. Immigration and Customs Enforcement ("ICE") at the **South Texas Detention Complex**, located in Pearsall, Texas.
2. **Respondent David J. Venturella** is the Acting Director of U.S. Immigration and Customs Enforcement ("ICE") and is responsible for the administration of immigration detention policies and practices affecting Petitioner.
3. **Respondent Warden of the South Texas Detention Complex** is Petitioner's immediate custodian and is responsible for Petitioner's day-to-day physical confinement.
4. Each Respondent acts under color of federal law and is sued in his or her official capacity only.

IV. FACTUAL BACKGROUND

1. **Petitioner Mounish Kukatla** is a native and citizen of India.

2. Petitioner was lawfully admitted to the United States on or about **December 2, 2015**, in **F-2 dependent status**, and has remained continuously present in the United States since that time.
3. Petitioner has **not been convicted of any criminal offense.** Although he was arrested for an allegation of **Public Intoxication** on or about May 11, 2026, the Municipal Court entered a **Deferred Disposition**, and no final criminal conviction has resulted from that incident.
4. Petitioner is the beneficiary of a **pending Form I-918, Petition for U Nonimmigrant Status.** On **November 16, 2022**, U.S. Citizenship and Immigration Services ("USCIS") issued Petitioner a **Bona Fide Determination ("BFD")**, granted him **deferred action**, and authorized him to work in the United States.
5. Petitioner's pending U Visa petition arises from his victimization during an **armed robbery.** As a result of that violent crime, Petitioner has received ongoing medical treatment since 2022 for **anxiety and depression** and continues to require medication and medical care.
6. Petitioner is married and is the father of a **United States citizen child.** He owns a residence in **San Antonio, Texas,** operates and manages **Sarit Solutions LLC,** has consistently filed federal income tax returns, maintains a verified residential address, and has substantial financial obligations in the United States.
7. On or about **May 11, 2026,** following his arrest for an allegation of Public Intoxication, Petitioner was taken into custody by U.S. Immigration and Customs Enforcement ("ICE") and transferred to the **South Texas Detention Complex** in Pearsall, Texas.
8. Petitioner is currently detained at the **South Texas Detention Complex,** located at **566 Veterans Drive, Pearsall, Texas 78061,** pending removal proceedings.
9. Petitioner is **statutorily eligible to pursue Cancellation of Removal pursuant to INA § 240A(b) (8 U.S.C. § 1229b(b))** and intends to seek that relief in his removal proceedings. He also intends to continue pursuing his pending **Form I-918, Petition for U Nonimmigrant Status.**
10. Petitioner is represented by experienced immigration counsel and is actively defending against removal before the Immigration Court. He intends to fully participate in his removal proceedings and pursue all forms of immigration relief for which he is eligible.

11. Despite Petitioner's lawful admission into the United States, more than ten years of continuous physical presence, strong family, business, and community ties, pending U Visa petition with a favorable **Bona Fide Determination**, eligibility for **Cancellation of Removal**, ownership of a home and business, absence of any final criminal conviction, documented medical treatment resulting from the armed robbery that forms the basis of his U Visa petition, and the absence of any individualized custody determination, ICE continues to detain him without a meaningful opportunity to challenge his detention

V. STATUTORY AND CONSTITUTIONAL FRAMEWORK

Federal district courts have jurisdiction under 28 U.S.C. § 2241 to review whether a noncitizen is "in custody in violation of the Constitution or laws or treaties of the United States." *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). Habeas jurisdiction extends to challenges to the **fact, duration, or legality of immigration detention**, including constitutional claims. *INS v. St. Cyr*, 533 U.S. 289, 290, 301 (2001).

Where, as here, a petitioner alleges that continued detention violates due process because it is arbitrary, punitive, or unsupported by any individualized findings, habeas jurisdiction is proper.

VI. ARGUMENT

A. Civil Immigration Detention Is Subject to Constitutional Due Process Limits

Immigration detention is civil, not criminal. As such, it is constitutionally permissible only if it serves a legitimate regulatory purpose and is accompanied by adequate procedural protections. *Zadvydas*, 533 U.S. at 690; *Demore v. Kim*, 538 U.S. 510, 527–28 (2003). The Supreme Court has repeatedly emphasized that civil detention may not be imposed as punishment and may not continue where it becomes excessive in relation to its regulatory purpose. *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992); *United States v. Salerno*, 481 U.S. 739, 747 (1987).

Even when Congress authorizes detention, "the Due Process Clause applies to all "persons" within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693.

B. Petitioner's Continued Detention Violates Substantive Due Process

Substantive due process forbids arbitrary civil detention that is not reasonably related to a legitimate governmental objective. *Zadvydas*, 533 U.S. at 690. The only permissible purposes of immigration detention are to prevent flight or to protect the community. *Demore*, 538 U.S. at 528.

Here, Petitioner's detention is unsupported by any individualized finding that it serves either purpose:

1. Petitioner has not been convicted of any criminal offense. Although he was arrested for an allegation of Public Intoxication, the Municipal Court entered a Deferred Disposition, and no final criminal conviction resulted from that incident.
2. Petitioner has resided continuously in the United States since his lawful admission on December 2, 2015, in F-2 dependent status.
3. No adjudicator has ever found Petitioner to be a danger to the community or a flight risk.
4. Petitioner has substantial family, business, and community ties in the United States. He is married, the father of a United States citizen child, owns a residence in San Antonio, Texas, operates and manages Sarit Solutions LLC, has consistently filed federal income tax returns, maintains a verified residential address, and has substantial financial obligations in the United States.
5. Petitioner is the beneficiary of a pending Form I-918, Petition for U Nonimmigrant Status, for which USCIS has already issued a Bona Fide Determination, granted deferred action, and authorized him to work in the United States. His U Visa petition arises from his victimization during an armed robbery, and he continues to receive treatment for anxiety and depression resulting from that violent crime.
6. Petitioner is currently represented by experienced immigration counsel, is actively defending against removal before the Immigration Court, intends to appear at all future

immigration proceedings, and intends to pursue Cancellation of Removal pursuant to INA § 240A(b), while continuing to pursue his pending U Visa petition.

7. Petitioner remains detained without any meaningful individualized custody determination, despite his lawful admission into the United States, lengthy residence, favorable exercise of discretion by USCIS through his Bona Fide Determination, strong family and community ties, ownership of a home and business, absence of any final criminal conviction, and the availability of less restrictive means to ensure his appearance at future immigration proceedings.

On or about **May 11, 2026**, Petitioner was arrested in **Seguin, Texas**, for an allegation of **Public Intoxication**. Petitioner fully cooperated with law enforcement and immigration officers throughout the encounter. He did not flee, resist, or obstruct the officers in any manner. Although Petitioner entered a plea of **no contest**, the Municipal Court entered a **Deferred Disposition**, and no final criminal conviction resulted from the incident. Nevertheless, despite his cooperation, his longstanding ties to the United States, and the absence of any final criminal conviction, Petitioner was taken into immigration custody, separated from his family, and transferred to the **South Texas Detention Complex**, located at **566 Veterans Drive, Pearsall, Texas 78061**, where he remains detained. DHS subsequently initiated removal proceedings by serving Petitioner with a Notice to Appear.

ICE's continued detention of Petitioner without any showing of necessity bears no reasonable relationship to a legitimate regulatory purpose. Detention under these circumstances is punitive in effect, not regulatory, and therefore violates substantive due process. *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992).

C. Arbitrary Executive Detention Without Judicial Review Violates Separation-of-Powers Principles

The writ of habeas corpus exists to prevent arbitrary executive detention. *St. Cyr*, 533 U.S. at 301. Where the Executive claims the authority to detain an individual indefinitely while disclaiming any obligation to provide a mechanism for review, habeas relief is essential.

ICE's position results in unbounded executive detention insulated from both administrative and judicial oversight. Such a regime is incompatible with fundamental constitutional principles. *Boumediene*, 553 U.S. at 783 ("The Framers viewed freedom from unlawful restraint as a fundamental precept of liberty."). Absent meaningful judicial review, the Executive's detention power exceeds constitutional limits.

Neither **Jennings v. Rodriguez, 583 U.S. 281 (2018), Matter of Yajure Hurtado**, nor **Buenrostro-Mendez** held that detention authorized by statute is exempt from constitutional review or immune from habeas corpus review under **28 U.S.C. § 2241**. The Supreme Court has repeatedly recognized that even civil immigration detention is subject to constitutional limitations. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Demore v. Kim*, 538 U.S. 510 (2003).

"The Government Cannot Carry Its Constitutional Burden"

This should become the centerpiece of the petition. Respondents will undoubtedly argue that Congress authorized detention under § 1225(b). Petitioner does not dispute that statutory authority may exist. The flaw in Respondents' position is that statutory authorization alone does not answer the constitutional question before this Court. Congress authorizes detention. The Constitution limits detention. Habeas exists to police that boundary.

Petitioner's challenge is therefore not a challenge to Congress's authority to authorize immigration detention. Rather, Petitioner challenges the constitutionality of his continued

detention where Respondents cannot identify individualized evidence demonstrating that he presents either a danger to the community or a meaningful risk of flight despite lawful admission into the United States on December 2, 2015, more than ten years of continuous residence in this country, pending Form I-918, Petition for U Nonimmigrant Status, for which USCIS has already issued a Bona Fide Determination, granted deferred action, and authorized him to work in the United States, eligibility to pursue Cancellation of Removal pursuant to INA § 240A(b), ownership of a residence in San Antonio, Texas, ownership and operation of Sarit Solutions LLC, consistent filing of federal income tax returns, strong family and community ties, marriage, United States citizen child, representation by experienced immigration counsel actively defending his removal proceedings before the Immigration Court, documented medical treatment for anxiety and depression resulting from the armed robbery that forms the basis of his pending U Visa petition, and the absence of any final criminal conviction.

Moreover, Petitioner's continued detention is particularly unreasonable because **USCIS has already exercised favorable discretion by determining that his U Visa petition is bona fide and by granting him deferred action and employment authorization.** Continued detention by ICE is inconsistent with that prior favorable exercise of discretion and undermines the humanitarian protections Congress intended to provide to qualifying crime victims through the U Visa program.

E. Exhaustion Is Excused and Habeas Relief Is Required

Exhaustion in § 2241 proceedings is prudential and is excused where administrative remedies are unavailable or futile. Respondents may argue that Petitioner should first seek a custody redetermination before the Immigration Court and, if unsuccessful, appeal any adverse decision to

the Board of Immigration Appeals ("BIA"). Under the circumstances presented here, however, requiring Petitioner to pursue those administrative procedures would serve no meaningful purpose.

Petitioner was **lawfully admitted** to the United States on December 2, 2015, and is currently represented by experienced immigration counsel in his removal proceedings. Nevertheless, despite his lawful entry, lengthy residence in the United States, pending U Visa petition with a favorable Bona Fide Determination, eligibility to seek Cancellation of Removal, strong family and community ties, ownership of a home and business, and the absence of any final criminal conviction, ICE continues to detain him without providing a meaningful individualized custody determination. The Petitioner has been in the United States for more than 10 years, he has qualifying relatives and has no disqualifying offenses that would prevent him from seeking that redress before the Immigration Court. INA240A(b).

Although Respondents may argue that Petitioner should first seek a bond hearing before the Immigration Court, requiring him to do so would elevate form over substance. In practice, Immigration Judges frequently conclude that they lack jurisdiction to conduct custody redeterminations in cases where DHS asserts mandatory detention or otherwise opposes bond. Even where a hearing is available, the Immigration Court cannot adjudicate Petitioner's constitutional claims or provide the full relief sought in this proceeding. Moreover, Petitioner's extensive positive equities—including his lawful admission into the United States, more than ten years of continuous residence, pending U Visa petition with a Bona Fide Determination, deferred action and employment authorization, eligibility for Cancellation of Removal, ownership of a home and business, United States citizen child, representation by immigration counsel, and the absence of any final criminal conviction—are already before this Court. Under these

circumstances, requiring Petitioner to pursue an administrative process that is unlikely to provide meaningful relief would serve only to prolong his detention while delaying judicial review of his constitutional claims.

Furthermore, the question before this Court is not whether Petitioner may eventually persuade an Immigration Judge to grant bond, but whether the Constitution permits Respondents to continue detaining him without a meaningful judicial determination that such detention remains necessary. Habeas corpus exists precisely to ensure that executive detention is subject to independent judicial review and does not become arbitrary through procedural delay or the absence of an effective remedy.

Moreover, this Court is fully capable of evaluating Petitioner's individualized circumstances and determining whether his continued detention comports with the Due Process Clause. The relevant facts—including Petitioner's lawful admission, more than ten years of residence, pending U Visa petition with deferred action, eligibility for Cancellation of Removal, representation by immigration counsel, strong family and business ties, and lack of any final criminal conviction—are already before the Court. Requiring Petitioner to pursue administrative remedies that are unlikely to provide meaningful relief would elevate form over substance and needlessly prolong an allegedly unconstitutional detention.

Accordingly:

- The Immigration Court is unlikely to provide meaningful relief under the circumstances presented;

- Administrative remedies are functionally unavailable or inadequate to address Petitioner's constitutional claims; and
- Exhaustion should be excused as futile.

A detainee is not required to pursue administrative remedies that are unavailable, inadequate, or incapable of providing the relief sought. Because Petitioner's challenge is fundamentally constitutional in nature, and because this Court is the only tribunal capable of providing meaningful habeas relief, exhaustion should be excused.

D. Release Is the Appropriate Habeas Remedy

Where detention violates the Constitution, release is the appropriate remedy. *Zadvydas*, 533 U.S. at 699; *Munaf v. Geren*, 553 U.S. 674, 693 (2008). Courts possess broad equitable authority under § 2241 to order release from unlawful custody. Because Petitioner's continued detention violates substantive and procedural due process, the writ should issue and Petitioner should be released forthwith.

VII. CLAIMS FOR RELIEF

COUNT I – Unlawful Detention (28 U.S.C. § 2241)

1. Petitioner incorporates all preceding paragraphs.
2. Respondents are detaining Petitioner in violation of the Constitution and laws of the United States.

COUNT II – Declaratory Relief

1. A declaration is warranted that Petitioner's continued detention is unlawful and violates the Due Process Clause of the Fifth Amendment.

VIII. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. **Grant this Petition** for Writ of Habeas Corpus;
2. **Order** Respondents to **immediately release** Petitioner **from ICE custody**; or
3. **Declare** that Petitioner's continued detention **violates the Constitution;**
4. **Prevent any future unconstitutional detention; and**
5. **Grant any other relief** the Court deems just and proper.

Respectfully submitted,

/s/ Rodolfo Castillo
Rodolfo Castillo
Attorney for Petitioner
Texas Bar No. 24000489
Rudy Castillo Law Firm
2621 Rockgate Dr.
San Antonio, TX 78227
Phone: (210) 777-1111
Email: rc@rudycastillolaw.com

XIV. SIGNATURE & VERIFICATION

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 07/02/2026

/s/ Rodolfo Castillo
Rodolfo A. Castillo
Attorney for Petitioner

EXHIBITS

1. **Exhibit A** – EOIR Automated Case Information System ("ACIS") printout reflecting that removal proceedings are currently pending against Petitioner and identifying his next scheduled hearing before the Immigration Court.
2. **Exhibit B** – Form I-918 Bona Fide Determination Notice establishing that USCIS has made a bona fide determination regarding Petitioner's pending Form I-918, Petition for U Nonimmigrant Status.
3. **Exhibit C** – Copy of Petitioner's Employment Authorization Document establishing Petitioner's authorization to work in the United States.
4. **Exhibit D** – Copy of Petitioner's Indian passport establishing Petitioner's identity, nationality, and date of birth.
5. **Exhibit E** – Copy of Petitioner's nonimmigrant visa documenting Petitioner's lawful admission to the United States.
6. **Exhibit F** – Copy of the birth certificate of Petitioner's United States citizen child, establishing Petitioner's substantial family ties and equities in the United States.
7. **Exhibit G** – Copy of Petitioner's marriage certificate establishing Petitioner's marital relationship.
8. **Exhibit H** – Copies of Petitioner's property deed and mortgage documents establishing Petitioner's substantial financial investment, long-term residence, and community ties in the United States.
9. **Exhibit I** – Employment verification letter confirming Petitioner's employment history, position, and continued employment upon release.
10. **Exhibit J** – Copies of Petitioner's federal tax returns establishing Petitioner's consistent employment history, financial responsibility, and compliance with federal tax obligations.
11. **Exhibit K** – Community support letters demonstrating Petitioner's good moral character, community involvement, and strong ties to the United States.
12. **Exhibit L** – Medical documentation relating to Petitioner's family, documenting ongoing medical conditions and the hardship resulting from Petitioner's continued detention.
13. **Exhibit M** – Attorney Declaration authenticating and attaching Exhibits A through M.

Exhibit A

An official website of the United States government
Here's how you know

EOIR Automated Case Information

Court Closures Today July 2, 2026

Please check https://www.justice.gov/eoir-operational-status for up to date closures.

Home > **KUKATLA, MOUNISH ([redacted])**

Automated Case Information

Name: KUKATLA, MOUNISH | A-Number: [redacted] |
Docket Date: 5/18/2026

Next Hearing Information

Your upcoming **INDIVIDUAL** hearing is **INTERNET-BASED** on **July 2, 2026** at **10:30 AM.**

JUDGE
Slitt, Andrew J.

WEBEX ADDRESS
https://eoir.webex.com/meet/IJ.Slitt

Court Decision and Motion Information

This case is pending.

BIA Case Information

No appeal was received for this case.

Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS
566 VETERAN DRIVE., SUITE 101
PEARSALL, TX 78061

PHONE NUMBER
(210) 368-5700

Exhibit B

November 16, 2022

RECEIVED
NOV 28 2022
BY:

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
38 River Road
Essex Junction, VT 05479-0001

U.S. Citizenship and Immigration Services

JOHN THOMAS DURISHAN
LUCY LU & ASSOCIATES
3475 LENOX RD STE 730
ATLANTA, GA 30326

RE: MOUNISH KUKATLA
I-918, Petition for U Nonimmigrant Status

CORRESPONDENCE

On May 13, 2019, you submitted a Form I-918, Petition for U Nonimmigrant Status. As the statutory cap for U-1 nonimmigrant status has been reached for this fiscal year, U.S. Citizenship and Immigration Services (USCIS) may not grant U-1 nonimmigrant status to any petitioner until new visas become available. Under 8 U.S.C. 1184(p)(6) and 1103(a), the Department of Homeland Security (DHS) may conduct a bona fide determination, and if warranted as a matter of discretion, provide employment authorization and deferred action.

At this time, the evidence demonstrates your petition for U nonimmigrant status is bona fide, and you warrant a favorable exercise of discretion to receive employment authorization and deferred action. Because USCIS has determined your petition is bona fide and you warrant a favorable exercise of discretion, you will be issued an employment authorization document and have been placed in deferred action. Your employment authorization document and grant of deferred action are valid for a period of four years. Deferred action is an act of administrative convenience to the government which gives some cases lower priority for removal.

Under 8 U.S.C. 1184(p)(6), if USCIS determines your petition is bona fide, you may submit a Form I-765, Application for Employment Authorization with this office. USCIS grants employment authorization based on the bona fide determination and favorable exercise of discretion described above under 8 U.S.C. 1184(p)(6), as well as under 8 CFR 274a.12(c)(14), which gives the agency the authority to provide employment authorization to noncitizens placed in deferred action. On July 20, 2021, you filed a Form I-765, [redacted], under 8 CFR, section 274a.12(c)(14). This Form I-765 is based on your pending Form I-918, which USCIS has determined is bona fide. Please be aware that your currently filed Form I-765 will be adjudicated as if it were filed under 8 CFR, section 274a.12(c)(14). You will receive separate correspondence regarding the adjudication of your Form I-765.

Priority for the issuance of U nonimmigrant status will be determined by the date the Form I-918 was received by USCIS. Once a visa is available to you, USCIS will determine your eligibility for U nonimmigrant status and whether you are admissible to the United States.

If you are represented by an attorney, all further correspondence should be accompanied by Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative.

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This notice does not constitute valid U nonimmigrant status or employment authorization, and may not be used to demonstrate legal immigration or employment status.

Sincerely,

Laura Zuchowski

Laura B. Zuchowski
Director
Officer: E38

Exhibit I

May 18, 2026

RE: Employment Verification for Mounish Kukatla

To Whom It May Concern:

This letter is to verify that Mr. Mounish Kukatla is the Owner and Managing Member of Sarit Solutions LLC, a legally registered business based in San Antonio, Texas.

Mr. Kukatla has been actively operating and managing the company since June 1, 2024, on a full-time basis. His responsibilities include overseeing daily business operations, client management, software consulting services, project coordination, financial management, and business development activities.

As part of his role, Mr. Kukatla utilizes professional skills in technology consulting, project management, software development support, customer communications, and operational management.

Sarit Solutions LLC remains an active operating business and continues to generate income and file federal tax returns accordingly. Supporting documents including business tax returns, Schedule K-1, and related financial documentation are attached as proof of ongoing business operations and employment.

Should you require any additional information, please feel free to contact us.

Sincerely,

Authorized Representative
Sarit Solutions LLC

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Exhibit K

AFFIDAVIT

I, Priyanka Bidthanapalli, under penalty of perjury, hereby declare and state the following to be true and correct to the best of my knowledge and belief:

1. My name is Priyanka Bidthanapalli. I am over the age of eighteen years old, competent to testify to the matters stated herein, and have personal knowledge of the facts contained in this affidavit.
2. I am submitting this affidavit in support of Mounish Kukatla.
3. Mounish Kukatla and I share a son together, [redacted] Kukatla, who was born on [redacted] in San Antonio,Tx. He is a United States Citizen.
4. Mounish is the primary financial provider for our household. He works diligently to ensure that our family is financially stable and that our daughter has a safe, loving, and supportive environment in which to grow.
5. Mounish takes great pride in being an involved and caring father. Despite the demands and pressures of work and life, he consistently prioritizes our Son's emotional well-being, education, and future. He is deeply involved in her daily life and provides constant love, encouragement, guidance, and support.
6. Our son is still very young and depends heavily on the care, affection, emotional support, and stability that Mounish provides every day. His absence would create significant emotional and financial hardship for our family.
7. Beyond being a devoted father, Mounish is a respectful, compassionate, and responsible individual. He is the foundation of our family and someone who consistently demonstrates integrity, kindness, and generosity toward others.
8. Mounish is a hardworking man who believes in earning everything through honest effort. Whether through operating his business, supporting his family, or helping others around him, he approaches every responsibility with sincerity and dedication.
9. Through the years, I have witnessed his perseverance, strong moral character, and commitment to building a stable and meaningful life for our family in the United States. He has always sought to contribute positively to his family and community.
10. I firmly believe that Mounish Kukatla is not a danger to the community and is not a flight risk. He has strong family, financial, and community ties in the United States and is committed to complying with all legal and court obligations.
11. I respectfully ask the Court to consider his good character, devotion to his family, and the hardship his absence would cause to our household and our son.

Should you require any additional information, I may be contacted at:

Phone Number: [redacted]

I hereby acknowledge that I am able to read, write, and speak English fluently. I have carefully read the foregoing affidavit and fully understand its contents. I certify under penalty of perjury that the statements made herein are true and correct.

Executed on this 18 day of May, 2026.

Sincerely,

[redacted]

05/20/2026

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To Whom It May Concern,

My name is Tamara Boccato, **and I am a United States citizen. I have known Mounish Kukatla for more than 10 years and am writing this letter in support of him.**

During the time I have known Mounish, I have come to know him as an honest, caring, hardworking, and respectful person. He consistently demonstrates kindness and concern for others and is always willing to help friends and family whenever needed.

Mounish is deeply devoted to his wife and children and works tirelessly to provide them with a stable and better future. He is a responsible family man whose presence and support are extremely important to his family. His absence has caused significant emotional and financial hardship for them.

While no one is perfect, I genuinely believe that Mounish is a person of good moral character, with a kind heart and strong values. I respectfully ask that you take his character and dedication to his family into consideration.

Thank you for taking the time to read this letter and for your consideration.

Sincerely,

Boccato tamara

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To Whom It May Concern,

My name is PAT. THOMAS , and I am a lawful permanent resident. I worked with Mounish Kukatla for approximately 3 years.

During that time, he consistently demonstrated honesty, professionalism, and dedication to his work. He was always respectful toward coworkers and willing to assist others whenever help was needed.

He maintained a positive attitude and strong work ethic even during stressful situations. He often spoke proudly about his family and his desire to create a stable future for them.

I believe he is a good-hearted and hardworking person who deserves consideration and an opportunity to continue supporting his loved ones.

Respectfully, Pat Thomas

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To Whom It May Concern,

I am writing in support of Mounish Kukatla. My name is Dwarakanath JV , and I am a lawful permanent resident living in the same neighborhood as him for the past 4 years.

During this time, I have found him to be respectful, responsible, and considerate toward everyone around him. He is known in our neighborhood as someone who is friendly, approachable, and always willing to lend a helping hand.

He takes great pride in caring for his family and maintaining a stable home environment. I have personally witnessed how much his family depends on him.

I sincerely believe he is a good individual with strong moral values and deserves an opportunity to remain with and support his family.

Sincerely,

Dwarak mouhnJV

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To Whom It May Concern,

My name is Joseph Campos and I am a U.S. citizen and active member of our local community. I have known Mounish Kukatla for several years through family gatherings and community events.

In all my interactions with him, he has shown kindness, humility, and respect toward everyone around him. He is a peaceful and caring person who values family and community relationships.

He is known as someone who works hard, remains positive even during stressful situations, and helps others whenever possible.

I respectfully request that his good moral character and commitment to his family be taken into consideration.

Sincerely, Joseph Campos

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To Whom It May Concern,

My name is Donald Ray Harris, and I am a lawful permanent resident. I know Mounish Kukatla through our children's school activities and events.

Every interaction I have had with him has been positive. He is respectful, patient, and supportive toward his family and others in the community.

He regularly participates in his children's lives and clearly prioritizes their well-being and future. His family deeply depends on his support and presence.

I respectfully ask that his good moral character and dedication to his family be considered during this difficult time.

Donald R. Harris

Sincerely,

55

To Whom It May Concern,

My name is William Gerber, and I am a lawful permanent resident. I know Mounish Kukatla through our children's school activities and events.

Every interaction I have had with him has been positive. He is respectful, patient, and supportive toward his family and others in the community.

He regularly participates in his children's lives and clearly prioritizes their well-being and future. His family deeply depends on his support and presence.

I respectfully ask that his good moral character and dedication to his family be considered during this difficult time.

Sincerely,

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Exhibit M

ATTORNEY DECLARATION IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I, **Rodolfo A. Castillo**, declare as follows:

1. I am an attorney licensed to practice law in the State of Texas and represent Petitioner, **Mounish Kukatla**, A# [redacted], in the above-captioned matter.
2. Petitioner Mounish Kukatla is currently detained by U.S. Immigration and Customs Enforcement ("ICE") at the **South Texas Detention Complex**, located at **566 Veterans Drive, Pearsall, Texas 78061.**
3. The document attached as **Exhibit A** is a true and correct copy of the EOIR Automated Case Information System ("ACIS") printout reflecting that removal proceedings are currently pending against Petitioner and identifying his next scheduled hearing before the Immigration Court.
4. The document attached as **Exhibit B** is a true and correct copy of Petitioner's **Form I-918 Bona Fide Determination Notice**, establishing that USCIS has made a bona fide determination regarding Petitioner's pending Form I-918, Petition for U Nonimmigrant Status.
5. The document attached as **Exhibit C** is a true and correct copy of Petitioner's **Employment Authorization Document**, establishing Petitioner's authorization to work in the United States.
6. The document attached as **Exhibit D** is a true and correct copy of Petitioner's **Indian passport**, establishing Petitioner's identity, nationality, and date of birth.
7. The document attached as **Exhibit E** is a true and correct copy of Petitioner's **nonimmigrant visa**, documenting Petitioner's lawful admission to the United States.
8. The document attached as **Exhibit F** is a true and correct copy of the **birth certificate of Petitioner's United States citizen child**, establishing Petitioner's substantial family ties and equities in the United States.
9. The document attached as **Exhibit G** is a true and correct copy of Petitioner's **marriage certificate**, establishing Petitioner's marital relationship.

10. The document attached as **Exhibit H** consists of copies of Petitioner's **property deed and mortgage documents**, establishing Petitioner's substantial financial investment, long-term residence, and community ties in the United States.
11. The document attached as **Exhibit I** is a true and correct copy of Petitioner's **employment verification letter**, confirming Petitioner's employment history, position, and continued employment upon release.
12. The document attached as **Exhibit J** consists of copies of Petitioner's **federal tax returns**, establishing Petitioner's consistent employment history, financial responsibility, and compliance with federal tax obligations.
13. The document attached as **Exhibit K** consists of **community support letters**, demonstrating Petitioner's good moral character, community involvement, and strong ties to the United States.
14. The document attached as **Exhibit L** consists of **medical documentation relating to Petitioner's family**, documenting ongoing medical conditions and the hardship resulting from Petitioner's continued detention.
15. The document attached as **Exhibit M** is a true and correct copy of this **Attorney Declaration**, authenticating and attaching Exhibits **A through L.**
16. I have personal knowledge of the foregoing facts and, if called as a witness, could and would testify competently thereto.
17. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this **2nd day of July, 2026**, in San Antonio, Texas.

/s/ Rodolfo Castillo
Rodolfo A. Castillo
Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this July 2nd , 2026, I electronically filed the foregoing Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 with the Clerk of the United States District Court for the Western District of Texas, San Antonio Division, using the CM/ECF system which automatically serves counsel for the Respondents.

In addition, a copy of this Petition was served by U.S. Mail upon:

Warden,
South Texas ICE Processing Center
566 Veterans Drive
Pearsall, Texas 78061

and

David Venturella,
Acting ICE Director,
U.S. Immigration and Customs Enforcement
500 12th St., SW
Washington, D.C. 20536

Respectfully submitted,

/s/ Rodolfo Castillo
Rodolfo Castillo
Attorney for Petitioner
Texas Bar No. 24000489
Rudy Castillo Law Firm
2621 Rockgate Dr.
San Antonio, TX 78227
Phone: (210) 777-1111
Email: rc@rudycastillolaw.com