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8 **UNITED STATES DISTRICT COURT**

9 **EASTERN DISTRICT OF CALIFORNIA**

Gurtaj SINGH

Petitioner,

v.

DAVID J. VENTURELLA, et. al.

Respondents.

Case No: 1:26-CV-05130-TLN-CKD

**PETITIONER'S TRAVERSE TO
RESPONDENTS' OPPOSITIONS**

I. INTRODUCTION

Respondents' Opposition fundamentally mischaracterizes the nature of this habeas proceeding. Throughout their Opposition, Respondents repeatedly rely on Petitioner's prior bond determinations and his decision not to appeal the Immigration Judge's bond ruling as though those facts alone resolve the constitutional issues presented before this Court. They do not.

This case is not an appeal from an Immigration Judge's bond determination. Nor does Petitioner ask this Court to review whether the Immigration Judge correctly denied bond under the Immigration and Nationality Act. Rather, this Court is asked to determine an entirely different question: whether Petitioner's continued civil immigration detention, which has now exceeded seven months while his appeal remains pending before the Board of Immigration Appeals ("BIA"), violates the Due Process Clause of the Fifth Amendment.

The issues considered during a bond hearing are significantly narrower than those presented in a federal habeas proceeding. An Immigration Judge determines whether an individual should be released under the applicable immigration statutes based primarily on danger to the community or risk of flight. A federal district court, however, considers whether continued detention has become constitutionally excessive under the totality of the circumstances. Accordingly, Respondents' repeated reliance on Petitioner's prior bond proceedings fails to address the constitutional question actually before this Court.

Respondents further argue that Petitioner's failure to administratively appeal the Immigration Judge's bond determination somehow renders his continued detention constitutional. This argument is legally unsound. The failure to appeal a bond determination does not transform otherwise unconstitutional detention into constitutional detention, nor does it deprive this Court of

1 its authority to review ongoing constitutional violations through a petition for writ of habeas corpus
2 under 28 U.S.C. § 2241.

3 Moreover, Respondents repeatedly contend that there has been "no material change" since
4 Petitioner's prior bond proceedings. That assertion ignores the most significant developments in
5 this case. Petitioner's detention has now continued for more than six months. His appeal before the
6 BIA remains pending with no predictable resolution. His medical condition has continued to
7 deteriorate while detained, and his wife is now approaching the birth of their second child. These
8 circumstances did not exist, or have substantially worsened, since Petitioner's prior custody
9 determinations and are precisely the type of changed circumstances relevant to this Court's
10 constitutional review.

11 Finally, Respondents never explain why Petitioner's continued detention remains necessary
12 today. Rather than demonstrating that Petitioner presently poses a danger to the community or a
13 meaningful flight risk, Respondents simply rely on prior bond determinations entered months ago.
14 The Constitution requires more. Because Respondents fail to justify Petitioner's continued
15 detention under the Fifth Amendment, their Opposition should be denied and the Petition for Writ
16 of Habeas Corpus should be granted.

17 **II. PETITIONER'S PRIOR BOND PROCEEDINGS DO NOT RESOLVE THE**
18 **CONSTITUTIONAL QUESTIONS PRESENTED IN THIS HABEAS ACTION**

19 Respondents' Opposition rests almost entirely on Petitioner's prior bond proceedings, arguing that
20 because an Immigration Judge previously denied bond and Petitioner did not appeal that

1 determination, this Court should deny habeas relief. This argument fundamentally misconstrues
2 both the nature of immigration bond proceedings and the purpose of federal habeas review.

3 An Immigration Judge's authority in a bond proceeding is limited. In deciding whether to grant
4 bond, the Immigration Judge considers whether the noncitizen presents a danger to the community
5 or a risk of flight under the immigration laws. The Immigration Judge does not determine whether
6 continued detention has become unconstitutional under the Fifth Amendment, nor does the
7 Immigration Judge possess jurisdiction to adjudicate constitutional claims challenging the legality
8 of prolonged civil detention.

9 By contrast, this Court is presented with an entirely different inquiry. Petitioner's habeas
10 petition does not ask this Court to reconsider the Immigration Judge's discretionary bond
11 determination. Rather, Petitioner asks this Court to determine whether his continued detention,
12 now exceeding seven months while his appeal remains pending before the Board of Immigration
13 Appeals, has become constitutionally excessive under the Due Process Clause of the Fifth
14 Amendment.

15 Accordingly, Respondents' repeated reliance on Petitioner's prior bond determinations is
16 misplaced. Whether the Immigration Judge previously found Petitioner to present a flight risk
17 under the immigration statutes does not answer the constitutional question presently before this
18 Court. Likewise, Petitioner's decision not to administratively appeal the bond determination does
19 not insulate Respondents from judicial review of an ongoing constitutional violation.

20 Respondents further contend that there has been "no material change" since Petitioner's prior
21 bond proceedings. Again, this argument overlooks the circumstances presently before the Court.

1 The most significant changes have occurred after those bond proceedings. Petitioner's detention
2 has continued for more than seven months with no definite end in sight. His appeal before the BIA
3 remains pending, making removal neither imminent nor reasonably foreseeable. At the same time,
4 Petitioner's medical condition has continued to worsen while detained, and his wife is approaching
5 the birth of their second child, circumstances that substantially increase both the hardship imposed
6 by continued detention and the constitutional concerns arising from it.

7 These developments are not merely factual updates; they fundamentally alter the constitutional
8 analysis. The passage of time itself is one of the most significant factors in determining whether
9 civil immigration detention has become unreasonably prolonged. Every additional day or month
10 of detention increases Petitioner's liberty interest and further weakens the Government's
11 justification for continued confinement absent meaningful constitutional review.

12 Respondents' position would effectively insulate prolonged immigration detention from
13 federal judicial review whenever an individual previously received a bond hearing, regardless of
14 how long detention continues or how circumstances change thereafter. That is not, and cannot be,
15 the law. The Constitution requires this Court to independently evaluate whether Petitioner's present
16 detention remains lawful—not simply whether an Immigration Judge reached a different
17 conclusion months earlier under a different legal framework.

18 For these reasons, Respondents' reliance on Petitioner's prior bond proceedings provides no
19 basis for denying habeas relief.

20 //

III. PETITIONER HAS SATISFIED, OR IN THE ALTERNATIVE IS EXCUSED
FROM, ANY PRUDENTIAL EXHAUSTION REQUIREMENT

Respondents next contend that this Court should decline to consider Petitioner's constitutional claims because Petitioner did not appeal the Immigration Judge's bond determination to the Board of Immigration Appeals. This argument fails both legally and factually.

As Respondents acknowledge, exhaustion is not a statutory prerequisite to habeas relief under 28 U.S.C. § 2241. Rather, any exhaustion requirement in immigration habeas proceedings is prudential, not jurisdictional. Courts have long recognized that prudential exhaustion should not be required where administrative remedies are inadequate, futile, incapable of providing the requested relief, or where requiring exhaustion would result in irreparable constitutional injury. That is precisely the circumstance presented here.

Petitioner is not seeking ordinary review of an Immigration Judge's bond determination. Nor does he ask this Court to decide whether the Immigration Judge correctly applied the immigration statutes governing bond. Instead, Petitioner challenges the constitutionality of his continued detention under the Fifth Amendment after more than seven months of civil confinement without any meaningful constitutional review.

The administrative process upon which Respondents rely is incapable of providing the relief sought in this case. An Immigration Judge may determine whether a noncitizen should be released under the immigration laws, but an Immigration Judge lacks authority to adjudicate whether continued detention violates the United States Constitution. Likewise, an appeal to the Board of Immigration Appeals would review the Immigration Judge's bond determination under the

1 immigration laws; it would not resolve Petitioner's constitutional challenge to the legality of his
2 prolonged detention.

3 Accordingly, requiring Petitioner to pursue additional administrative review would serve no
4 practical purpose. Even had Petitioner appealed the prior bond determination, he would have
5 remained detained throughout that process while the same constitutional injuries continued
6 unabated. The administrative process therefore could not have afforded timely or meaningful relief
7 from the constitutional violations alleged in this Petition.

8 Indeed, Respondents' exhaustion argument demonstrates precisely why further administrative
9 review would have been futile. Petitioner's removal order is currently on appeal before the Board
10 of Immigration Appeals, yet he remains detained throughout that appellate process. Thus, even
11 where Petitioner has properly exercised his appellate rights, the mere pendency of an
12 administrative appeal provides no relief from continued detention.

13 The same would have been true had Petitioner appealed the Immigration Judge's bond
14 determination. He would have remained detained while awaiting yet another administrative
15 decision, a process that could take months, during which the constitutional injury alleged in this
16 Petition would continue unabated. More importantly, the Board would not address the
17 constitutional question presented here. Rather, it would merely review the Immigration Judge's
18 bond determination under the immigration laws. Consequently, requiring Petitioner to pursue such
19 an appeal would have served no meaningful legal purpose and could not have provided the
20 constitutional review that only this Court is empowered to undertake.

1 Respondents therefore cannot transform Petitioner's decision not to pursue a futile
2 administrative appeal into evidence that his continued detention is constitutional. The
3 constitutionality of Petitioner's present detention depends upon the Fifth Amendment, not upon
4 whether he sought further administrative review of a prior bond determination.

5 Moreover, Respondents overlook that Petitioner attempted to pursue every meaningful avenue
6 available to challenge his continued detention. Relying on the procedures recognized following
7 Rodriguez Diaz, Petitioner requested an additional custody determination before the Immigration
8 Court. Despite submitting the necessary filings and supporting evidence, that request was rejected
9 without any review of the merits. Having unsuccessfully pursued the available administrative
10 mechanisms, Petitioner was left without an effective forum in which to obtain review of the
11 constitutional legality of his continued detention. Under these circumstances, further exhaustion
12 would have been plainly futile.

13 Respondents' reliance on *Leonardo v. Crawford* is therefore misplaced. That decision does not
14 establish a categorical rule requiring exhaustion in every immigration habeas case regardless of
15 the nature of the constitutional claims asserted or the adequacy of the available administrative
16 remedies. Nor does it eliminate the longstanding principle recognized by the Ninth Circuit that
17 prudential exhaustion may be excused where administrative remedies are inadequate or futile.

18 Respondents likewise misread *Mansoor v. Figueroa*. Although an Immigration Judge
19 possesses authority to make factual findings relevant to immigration custody determinations, that
20 authority does not extend to deciding whether a petitioner's continued detention has become
21 unconstitutional under the Fifth Amendment. The existence of factual findings in an immigration

1 proceeding does not deprive this Court of its independent responsibility to adjudicate constitutional
2 claims arising under 28 U.S.C. § 2241.

3 Accepting Respondents' argument would lead to an untenable result. Under their reasoning,
4 any factual findings made by an Immigration Judge would effectively preclude subsequent
5 constitutional review simply because the Immigration Judge previously considered certain
6 evidence. That cannot be the law. By the same logic, immigrants would be required to litigate
7 every legal dispute before the Immigration Court merely because the Immigration Judge is familiar
8 with the underlying facts. Constitutional claims, however, are neither displaced nor extinguished
9 by prior administrative proceedings. They remain subject to independent judicial review by this
10 Court.

11 In *Kahraman v. Lyons, et.al.*, Case No. 1:26-CV-02655-TLN-JDP, (E.D. Cal. May 6,
12 2026), the court held that although the Petitioner's prior bond request was denied by the IJ, and
13 although the Petitioner did not appeal the bond denial, his detention violated the Fifth Amendment
14 and ordered a bond hearing where the government failed to demonstrate danger or flight risk

15 Because the administrative remedies identified by Respondents were incapable of providing
16 the constitutional relief sought, and because Petitioner diligently pursued the meaningful remedies
17 available to him before filing this action, Respondents' exhaustion argument provides no basis for
18 dismissal of the Petition.

19 **IV. RESPONDENTS FAIL TO ESTABLISH THAT PETITIONER'S CONTINUED**
20 **DETENTION REMAINS CONSTITUTIONALLY JUSTIFIED**

1 Respondents repeatedly assert that Petitioner's continued detention remains lawful because an
2 Immigration Judge previously determined that Petitioner presented a flight risk and because no
3 "material change" has occurred since that determination. This argument fails to address the
4 constitutional question before this Court and ignores the substantial changes that have occurred
5 since Petitioner's prior bond proceedings.

6 First, Respondents never explain why Petitioner allegedly presents a flight risk today. Instead,
7 they simply refer this Court to bond determinations issued months ago. That is insufficient. If
8 Respondents ask this Court to defer to those prior determinations, they must also demonstrate that
9 the factual basis supporting those determinations continues to exist. Their Opposition, however,
10 contains no meaningful explanation of why Petitioner presently poses a flight risk or why
11 continued detention remains necessary.

12 Indeed, Respondents identify no new misconduct, no violation of any court order, no failure to
13 appear, no criminal conduct, and no attempt by Petitioner to evade immigration authorities. Rather,
14 the record demonstrates the opposite. Petitioner has resided continuously in California for years,
15 has never relocated outside the state, has established a stable family life, maintained employment,
16 and remained actively involved in his religious and local community. These objective facts
17 strongly undermine any suggestion that Petitioner presents a meaningful risk of flight.

18 Respondents likewise maintain that no material change has occurred since Petitioner's prior
19 bond proceedings. That assertion ignores the most significant developments in this case.

20 Most importantly, Petitioner's detention has now exceeded seven months. The continued
21 passage of time is itself a material change because prolonged civil detention necessarily alters the

1 constitutional analysis. What may have been permissible during the early stages of detention
2 cannot automatically remain constitutional months later while detention continues indefinitely.

3 Likewise, Petitioner's appeal remains pending before the Board of Immigration Appeals, and
4 there is no indication when a final administrative decision will issue. During the pendency of that
5 appeal, Petitioner's removal is not imminent. Thus, the Government's asserted justification for
6 continued detention grows progressively weaker as time passes while Petitioner's liberty interest
7 becomes increasingly substantial.

8 Respondents also disregard Petitioner's worsening personal circumstances. While detained,
9 Petitioner's hypertension has become increasingly difficult to manage, and he has experienced
10 ongoing difficulty obtaining consistent medical treatment and necessary medication. At the same
11 time, Petitioner's wife is approaching the birth of their second child. His continued detention
12 prevents him from providing emotional, physical, and financial support to his wife during
13 pregnancy and childbirth and from caring for their existing child. These circumstances
14 significantly increase the hardship imposed by continued detention and further distinguish
15 Petitioner's current circumstances from those existing during the earlier bond proceedings.

16 Despite these material developments, Respondents simply repeat that "no material change"
17 exists without addressing any of these facts. Such a conclusory assertion cannot satisfy the
18 Government's burden of demonstrating that Petitioner's continued detention remains
19 constitutionally justified.

20 Ultimately, Respondents ask this Court to treat a months-old immigration bond determination
21 as permanently dispositive of Petitioner's constitutional rights. The Constitution requires

1 considerably more. This Court must evaluate whether Petitioner's detention is constitutional today,
2 based upon the present facts and the totality of the circumstances, not simply defer to an
3 administrative decision rendered months ago under a different legal framework.

4 Finally, Respondents' position would effectively require this Court to treat an Immigration
5 Judge's earlier bond determination as permanently dispositive, regardless of how long detention
6 continues or how dramatically circumstances evolve thereafter. That is inconsistent with the
7 fundamental principles underlying habeas corpus review. The purpose of this proceeding is to
8 determine whether Petitioner's detention, as it exists today, complies with the Constitution. It is
9 not to determine whether an earlier immigration bond determination was correct when it was
10 issued.

11 Because Respondents fail to identify any present factual basis demonstrating that Petitioner
12 remains a danger to the community or a meaningful flight risk, and because they fail to account
13 for the significant changes that have occurred during Petitioner's prolonged detention, their
14 Opposition fails to justify Petitioner's continued confinement under the Fifth Amendment.

15 **V. RESPONDENTS MISCHARACTERIZE PETITIONER'S MEDICAL CLAIMS AND**
16 **FAIL TO ADDRESS THE ONGOING CONSTITUTIONAL HARM CAUSED BY**
17 **CONTINUED DETENTION**

18 Respondents argue that Petitioner's allegations regarding his medical condition are not
19 properly raised in a habeas proceeding because they concern the conditions of his confinement
20 rather than the fact of his detention. This argument mischaracterizes Petitioner's claim.

1 Respondents' arguments likewise reflect a fundamental misunderstanding of the nature of
2 habeas corpus review. Rather than addressing whether Petitioner's continued detention remains
3 constitutional, Respondents repeatedly attempt to narrow this case into issues concerning bond
4 appeals or isolated conditions of confinement. That is not the claim before this Court.

5 A petition for writ of habeas corpus under 28 U.S.C. § 2241 exists precisely to permit federal
6 courts to examine whether a person's present detention violates the Constitution or laws of the
7 United States. Petitioner's medical condition, family circumstances, prolonged detention, and the
8 absence of any legitimate governmental justification are all relevant components of that
9 constitutional inquiry. Respondents' repeated attempts to characterize these issues as categorically
10 outside the scope of habeas review do not answer the constitutional violations alleged in the
11 Petition.

12 Petitioner is not asking this Court to supervise the daily medical operations of the detention
13 facility, nor does he seek an order directing Respondents to provide a particular course of medical
14 treatment. Likewise, this action is not a medical malpractice claim or a conditions-of-confinement
15 lawsuit challenging isolated deficiencies within the detention facility.

16 Rather, Petitioner's medical condition is presented as one of several constitutional factors
17 demonstrating that his continued detention has become unreasonable, excessive, and incompatible
18 with the Due Process Clause of the Fifth Amendment.

19 Petitioner suffers from hypertension, a chronic medical condition requiring regular monitoring,
20 consistent medication, and appropriate medical care. As alleged in the Petition, Petitioner's
21 condition has become increasingly difficult to manage while detained, and he has experienced

1 continuing difficulty obtaining adequate and consistent access to necessary medication. As his
2 detention continues, so too does the risk that his medical condition will further deteriorate.

3 These facts are directly relevant to the constitutional inquiry before this Court. The question is
4 not whether the detention facility committed medical negligence; rather, the question is whether
5 the Government may continue to subject Petitioner to prolonged civil detention despite the
6 substantial and continuing harm that such detention is causing. Petitioner's medical condition
7 therefore forms part of the totality of circumstances that this Court must consider in determining
8 whether continued detention remains constitutionally permissible.

9 Respondents likewise ignore the significant humanitarian considerations presented by
10 Petitioner's continued detention. Petitioner's wife is currently pregnant with their second child and
11 is expected to give birth in the near future. His continued confinement prevents him from
12 supporting his wife during pregnancy and childbirth, caring for their existing child, and providing
13 the emotional and financial support that his family urgently requires. These circumstances do not
14 merely reflect personal hardship; they further demonstrate that continued detention serves no
15 legitimate regulatory purpose while imposing increasingly severe consequences upon both
16 Petitioner and his family.

17 Respondents also continue to assert, without meaningful analysis, that Petitioner presents a
18 flight risk. Yet they never explain why that conclusion remains valid today. Petitioner has lived in
19 California for years, has never relocated outside the state, has maintained stable employment, has
20 no criminal history, and has consistently complied with his immigration proceedings. He has a
21 wife, a young child, another child expected imminently, and deep ties to his religious community.

1 Respondents identify no specific conduct occurring after Petitioner's detention that would
2 reasonably suggest any intent to abscond or evade future immigration proceedings.

3 Indeed, Petitioner's family circumstances strongly undermine any suggestion that he presents
4 a meaningful flight risk. A husband whose wife is preparing to give birth, and who has established
5 substantial family, employment, and community ties within California, is far more likely to remain
6 with his family and continue complying with all court proceedings than to flee. Respondents offer
7 nothing beyond speculation to support their contrary assertion.

8 When Petitioner's deteriorating medical condition, prolonged detention, pending BIA appeal,
9 extensive community ties, stable family relationships, and the absence of any evidence of
10 dangerousness or present flight risk are considered together, the totality of the circumstances
11 demonstrates that Petitioner's continued detention no longer bears a reasonable relationship to any
12 legitimate governmental objective. The Fifth Amendment requires more than the conclusory
13 assertions offered in Respondents' Opposition.

14 **VI. PETITIONER SATISFIES THE REQUIREMENTS FOR HABEAS RELIEF AND**
15 **TEMPORARY RESTRAINING ORDER**

16 Respondents likewise argue that Petitioner's request for a Temporary Restraining Order should
17 be denied because Petitioner cannot demonstrate a likelihood of success on the merits or
18 irreparable harm. Neither argument is persuasive.

19 First, for the reasons discussed throughout this Traverse, Petitioner has demonstrated a
20 substantial likelihood of success on the merits. Respondents devote the majority of their
21 Opposition to Petitioner's prior bond proceedings while failing to address the actual constitutional

1 question presented by this case. The issue before this Court is not whether an Immigration Judge
2 properly denied bond months ago, but whether Petitioner's continued detention after more than
3 seven months of civil confinement remains consistent with the Due Process Clause of the Fifth
4 Amendment. Respondents offer no meaningful explanation why Petitioner's continued detention
5 remains constitutionally justified today.

6 Second, Respondents incorrectly contend that Petitioner has failed to demonstrate irreparable
7 harm. Every additional day of unconstitutional detention constitutes an irreparable deprivation of
8 liberty. Courts have consistently recognized that the loss of constitutional freedoms, even for
9 minimal periods of time, constitutes irreparable injury warranting injunctive relief.

10 Moreover, Petitioner's irreparable harm extends well beyond the loss of his physical liberty.
11 As explained in the Petition, Petitioner suffers from hypertension requiring ongoing medical
12 treatment and medication. His continued detention has made management of this condition
13 increasingly difficult and exposes him to an ongoing risk of further deterioration. These injuries
14 cannot be remedied after the fact through monetary damages or subsequent judicial review.

15 Petitioner also faces immediate and irreparable family hardship. His wife is currently in the
16 final stages of pregnancy with their second child. His continued detention prevents him from
17 supporting his wife during childbirth, caring for his existing child, and fulfilling his responsibilities
18 as a husband and father during one of the most significant moments in his family's life. Once these
19 events have passed, no future judicial decision can restore the time, support, or family presence
20 that continued detention now deprives them of.

1 Respondents likewise fail to demonstrate that the balance of equities favors continued
2 detention. Petitioner has resided in California for years, has never left the state, has maintained
3 stable employment, possesses significant family and community ties, has no criminal history, and
4 has consistently participated in his immigration proceedings. Respondents identify no concrete
5 evidence establishing that Petitioner presently poses either a danger to the community or a
6 meaningful risk of flight. Instead, Respondents rely exclusively upon prior bond determinations
7 without explaining why those conclusions remain accurate after more than seven months of
8 continued detention.

9 Finally, the public interest strongly favors protection of constitutional rights. The Government
10 has no legitimate interest in continuing detention that exceeds constitutional limits. To the
11 contrary, the public has a compelling interest in ensuring that civil immigration detention remains
12 consistent with the protections guaranteed by the Fifth Amendment. The public also has an interest
13 in avoiding unnecessary expenditures of government resources where continued detention no
14 longer serves any meaningful regulatory purpose.

15 For all of these reasons, Petitioner respectfully submits that he has satisfied the requirements
16 for both habeas relief and temporary injunctive relief. The Court should therefore deny
17 Respondents' Opposition, grant the Petition for Writ of Habeas Corpus, order Petitioner's
18 immediate release from ICE custody, or, in the alternative, order Respondents to provide Petitioner
19 with a constitutionally adequate custody hearing without further delay.

20 **CONCLUSION**

1 Respondents' Opposition never meaningfully addresses the constitutional issue presented
2 by this case. Instead, Respondents repeatedly rely on Petitioner's prior bond proceedings while
3 failing to demonstrate why Petitioner's continued detention, now exceeding seven months, remains
4 constitutionally permissible. They do not explain why Petitioner presently poses a danger to the
5 community or a meaningful flight risk, nor do they meaningfully address Petitioner's prolonged
6 detention, deteriorating medical condition, pending BIA appeal, or significant family
7 circumstances.

8 The Due Process Clause requires more than reliance on months-old administrative
9 determinations. It requires meaningful judicial review of whether continued civil detention
10 remains constitutionally justified under the totality of the circumstances. Because Respondents
11 have failed to make that showing, Petitioner respectfully requests that this Court reject
12 Respondents' arguments, grant the Petition for Writ of Habeas Corpus, grant Petitioner's request
13 for emergency injunctive relief, and order Petitioner's immediate release. In the alternative,
14 Petitioner respectfully requests that the Court order Respondents to provide a constitutionally
15 adequate custody hearing consistent with the requirements of the Fifth Amendment.

16 DATED: 07/18/2026



17 Saime Atakan

18 Attorney for Petitioner