

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Sunny Ghotra Singh v. Leonard Oddo, et al.

Singh · No. 3:25-cv-00269 · Decided December 16, 2025

SUMMARY

The United States District Court for the Western District of Pennsylvania granted Sunny Ghotra Singh’s amended 28 U.S.C. § 2241 habeas petition. Applying Zadvydas v. Davis, the court held that Singh’s continued post-removal-order detention was unauthorized because there was no significant likelihood of removal in the reasonably foreseeable future and respondents failed to rebut that showing. The court directed Singh’s release subject to appropriate supervision conditions.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Maureen P. Kelly
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	December 16, 2025
DOCKET	3:25-cv-00269
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 from prolonged post-removal-order immigration detention. After filing an amended petition, the parties answered and petitioner filed a traverse; the district court granted the amended petition and ordered his release subject to appropriate conditions of supervision.
STANDARD OF REVIEW	The court evaluated the statutory and constitutional legality of continued post-removal-order detention under 28 U.S.C. § 2241 and the framework established in Zadvydas v. Davis.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion; persuasive rather than precedential
PARTIES	Sunny Ghotra Singh v. Leonard Oddo, et al.

TOPICS

- federal habeas corpus
- immigration detention
- removal proceedings
- immigration

PRACTICE AREAS

immigration

federal habeas corpus

immigration detention

QUESTIONS PRESENTED

1. Whether the court had jurisdiction under 28 U.S.C. § 2241 to review the legality of Singh's continued post-removal-order detention.
2. Whether Singh's continued detention under 8 U.S.C. § 1231(a)(6) was authorized when removal was not significantly likely to occur in the reasonably foreseeable future.
3. Whether the court needed to reach Singh's claim that he was a United States citizen based on newly discovered birth and adoption evidence.

HOLDINGS

1. Section 2241 provides jurisdiction to consider statutory and constitutional challenges to post-removal-period detention, even though the court may not directly review the underlying final order of removal.
2. When an alien has provided good reason to believe that removal is not significantly likely in the reasonably foreseeable future, and the government fails to rebut that showing with sufficient evidence, continued detention under § 1231(a) is unauthorized and habeas relief must be granted.
3. The court did not need to decide the merits of Singh's claim that he was a United States citizen because relief was warranted on the independent ground that his continued detention was unauthorized.

KEY QUOTATIONS

“Once the 90-day removal period of Section 1231(a) has passed, and after “removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute[,]” and the alien must be released.” (at 4)

“A remote possibility of an eventual removal is not analogous to a significant likelihood that removal will occur in the reasonably foreseeable future.” (at 5)

“Petitioner’s continued detention is not authorized by Section 1231.” (at 5)

FACTUAL BACKGROUND

Singh, an Indian national subject to a 2020 removal order, had previously been detained for nearly a year before being released under supervision in 2021. DHS revoked his supervised release and detained him again on April 17, 2025, but the record indicated that DHS had not obtained travel documents and continued to direct him to apply for an Indian passport. By the time of the opinion, he had been detained for nearly eight months during the second period, in addition to his earlier post-removal detention, and respondents presented no evidence that removal was reasonably foreseeable.

PROCEDURAL HISTORY

Singh filed an initial § 2241 petition on August 21, 2025 and an amended petition on September 16, 2025. He challenged detention under 8 U.S.C. § 1231(a), arguing that removal was not reasonably foreseeable. The court concluded that respondents failed to rebut his showing under *Zadvydas v. Davis* and granted the writ.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

No remand was ordered. The court directed Singh's release from custody forthwith, subject to appropriate conditions under 8 U.S.C. § 1231(a)(3).

CASES CITED

- Anariba v. Director, Hudson County Correctional Center, 17 F.4th 434, 448 (3d Cir. 2021)
- United States v. Singh, 777 F. App'x 178 (8th Cir. 2019)
- Flores-Torres v. Mukasey, 548 F.3d 708, 710-11 (9th Cir. 2008)
- Olopade v. Attorney General, 565 F. App'x 71, 73 (3d Cir. 2014)
- Zadvydas v. Davis, 533 U.S. 678, 688-89, 699, 701 (2001)
- Roe v. Oddo, No. 25-cv-128J, 2025 WL 1892445, at *4 (W.D. Pa. July 9, 2025)
- Escalante v. Noem, No. 25-cv-182, 2025 WL 2206113, at *3-4 (E.D. Tex. Aug. 2, 2025)
- Kane v. Mukasey, No. 08-cv-037, 2008 WL 11393137, at *5 (S.D. Tex. Aug. 21, 2008)
- Muza v. Werlinger, 415 F. App'x 355, 357 n.1 (3d Cir. 2011)