

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

K.E.G.M. (age eleven),

Ms. M.,

Petitioners-Plaintiffs,

v.

Doe #1, in their official capacity as the Warden of the Detention Center where Petitioners-Plaintiffs are Detained; Doe #2, Field Office Director With Jurisdiction over the Detention Center where Petitioners-Plaintiffs are Detained, Enforcement and Removal Operations, U.S. Immigration & Customs Enforcement; TODD LYONS, in his official capacity as Acting Director U.S. Immigrations and Customs Enforcement; KRISTI NOEM, in her official capacity as U.S. Secretary of Homeland Security; PAMELA BONDI, in her official capacity as Attorney General of the U.S.; SIRCE E. OWEN, in her official capacity as Acting Director of the Executive Office for Immigration Review; U.S. DEPARTMENT OF HOMELAND SECURITY; U.S. IMMIGRATIONS AND CUSTOMS ENFORCEMENT; U.S. DEPARTMENT OF JUSTICE; and U.S. EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,

Respondents-Defendants.

Case No. 1:25-cv-02215

EMERGENCY MOTION FOR ISSUANCE OF ORDER TO SHOW CAUSE

1. Pursuant to 28 U.S.C. § 2243, Petitioners-Plaintiffs K.E.G.M. and Ms. M. (“Petitioners”) respectfully request that the Court issue an order to Respondents-Defendants (“Respondents”), requiring them to show cause as to why Petitioners’ Petition for Writ of Habeas Corpus pursuant to 8 U.S.C. § 2241 should not be granted.

2. In their Petition for Writ of Habeas Corpus and Complaint, Petitioners challenge their illegal courthouse arrest and their illegal subsequent detention by Respondents, in violation of

the Constitution, the Immigration and Nationality Act, and the Administrative Procedure Act. They seek immediate release or, in the alternative, a bond hearing in which the Department of Homeland Security (DHS) bears the burden of establishing that Petitioners are a flight risk or danger to society in order to justify their continued detention.

3. The federal habeas corpus statute provides that “[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” 28 U.S.C. § 2243.

4. Section 2243 mandates that the writ or order to show cause “shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed.”

5. Section 2243 further requires the court to hold a hearing on the writ or order to show cause “not more than five days after the return unless for good cause additional time is allowed.”

6. Finally, Section 2243 provides that the court “shall summarily hear and determine the facts, and dispose of the matter as law and justice require.”

7. Pursuant to 28 U.S.C. § 2243, Petitioners respectfully request that the Court immediately issue an Order to Show Cause against Respondents.

8. Petitioners further request pursuant to 28 U.S.C. § 2243 that the Court require Respondents to file a return within three days of the Court’s order, showing cause, if any, why the writ of habeas corpus should not be granted.

Dated: July 11, 2025

Respectfully submitted,

/s/ Amber Qureshi

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Pro Bono Counsel for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

I further certify that I will send by electronic mail, a copy of the foregoing and Petitioners' Petition and Complaint to the Chief and Deputy Chiefs of the Civil Division of the United States Attorney's Office for the District of Columbia.

Dated: July 11, 2025

Respectfully submitted,

/s/ Amber Qureshi

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