

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KOSTIANTYN KUZOVKOV
Petitioner,

v.

PAMELA BONDI, *et al.*,
Respondents.

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Case No. 4:25-cv-03266

**EMERGENCY MOTION TO ENFORCE HABEAS CORPUS ORDER AND
FOR IMMEDIATE RELEASE**

Petitioner, through counsel, respectfully moves this Court for an emergency order enforcing its habeas corpus ruling entered on September 5, 2025, in which the Court granted the petition for writ of *habeas corpus* and ordered Respondents to immediately release Petitioner from detention. Dkt. 12.

The Court's order was entered at 4:00 p.m. on September 5, 2025 and was served on Respondents' counsel immediately thereafter. No stay of the Court's order has been granted or is pending.

As of morning of September 6, 2025, Petitioner remains in Immigration and Customs Enforcement custody at the Joe Corley Processing Center.

As of the filing of this motion, more than 18 hours after the Court's order, Respondents have failed to comply with the Court's directive and continue to detain Petitioner in violation of the Court's order and in violation of federal law.

REQUEST FOR RELIEF

Petitioner respectfully requests that the Court:

1. Issue an order requiring Respondents to immediately comply with the habeas order and release Petitioner forthwith;
2. Order Respondents to file a written status report by 4:00 p.m. confirming Petitioner's release or explaining any basis for delay;
3. Warn Respondents and/or the responsible government officials that failure to comply may result in contempt sanctions.

CONCLUSION

The Respondents have no lawful basis to continue detaining Petitioner. Absent a stay, the Court's order is final and binding. Petitioner respectfully urges the Court to act swiftly to protect his liberty and enforce its authority.

Dated: September 6, 2025

Respectfully submitted,

By: /s/ Rebecca Chavez

Rebecca Chavez
**GALVESTON-HOUSTON IMMIGRANT
REPRESENTATION PROJECT**

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Attorney for Petitioner

CERTIFICATE OF COMPLIANCE

I certify that the foregoing documents has 250 words in Times New Roman 14-point font excluding the captions, tables, signature blocks, this certificate, and certificate of service.

/s/Rebecca Chavez
Rebecca Chavez
Attorney for Petitioner

CERTIFICATE OF CONFERENCE

On September 6, 2025, Petitioner's counsel attempted to confer with Assistant United States Attorney, Catina Perry, via phone and email but did not receive a response.

/s/Rebecca Chavez
Rebecca Chavez
Attorney for Petitioner

CERTIFICATE OF SERVICE

I certify that on September 6, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/Rebecca Chavez
Rebecca Chavez
Attorney for Petitioner