

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

ALMA BELLA BOWMAN,	:	
	:	
Petitioner,	:	
	:	Case No. 4:25-CV-251-CDL-CHW
v.	:	28 U.S.C. § 2241
	:	
WARDEN, STEWART DETENTION	:	
CENTER,	:	
	:	
Respondent.	:	

JOINT MOTION TO STAY PETITION

COME NOW, Petitioner, Alma Bella Bowman, and Respondent, Warden, Stewart Detention Center, (collectively the “Parties”) and file this Joint Motion to Stay Petition, showing the Court as follows:

1. On August 1, 2025, the Court received Petitioner’s Petition for a Writ of Habeas Corpus (“Petition”). ECF No. 1.
2. On August 8, 2025, the Court ordered Respondent to file a response to the Petition within three days. ECF No. 3.
3. On August 11, 2025, Respondent filed his Return and Motion for Extension of Time to Respond. ECF No. 5.
4. The next day, the Court granted Respondent’s Motion and extended the deadline to respond to the Petition until September 2, 2025. ECF No. 6.
5. As of the date of this filing, Petitioner remains in immigration detention at Stewart Detention Center in Lumpkin, Georgia, pursuant to 8 U.S.C. § 1231(a).

6. On August 7, 2025, Petitioner filed a Form N-600 Application for Certificate of Citizenship with U.S. Citizenship and Immigration Services (“USCIS”). *See* Declaration of David Bush (“Bush Decl.”), ECF No. 5-1 at ¶ 16 & Ex. N.

7. Petitioner’s Form N-600 is under review by USCIS.

8. Respondent has continued its efforts to remove Petitioner from the United States pursuant to a Final Order of Removal dated June 4, 2020.

THEREFORE, whereas the Parties desire to resolve the disputed issues as expeditiously as possible, and whereas completion of USCIS’s review of Petitioner’s Form N-600 will assist in that resolution, the Parties agree to and request the Court approve the following:

Respondent will not effectuate Petitioner’s removal from the United States nor transfer her from the jurisdiction of this Court for a period of 90 days from the date of this Joint Motion.

The Parties request that the Court stay Petitioner’s Petition for Habeas Corpus for a period of 90 days from the date of this Joint Motion.

At or before the conclusion of the 90-day stay, the Parties will file a joint status report advising the Court of the status of the case and whether additional briefing is necessary to resolve the claims asserted in the Petition.

Respectfully submitted, this 2nd day of September, 2025.

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