

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

CARLOS ALBERTO RODELO ECHAVEZ)
(A [REDACTED]),)
Petitioner)
v.)
TODD M. LYONS, in his official capacity as)
Acting Director, U.S. Immigration and)
Customs Enforcement; STANLEY)
CROCKETT, in his official capacity as Field)
Director of the ICE New Orleans Field)
Office; WARDEN, JACKSON PARISH)
CORRECTIONAL CENTER, in their official)
capacity,)
Respondents)

)

Case No. 3:25-cv-1282

) MOTION FOR THE ISSUANCE OF AN
ORDER TO SHOW CAUSE, AND
TEMPORARY RESTRAINING ORDER
OR PRELIMINARY INJUNCTION

On September 3, 2025, Petitioner Carlos Alberto Rodelo Echavez (“Mr. Rodelo”) filed a petition for a writ of habeas corpus on the basis that his immigration detention violates the Immigration and Nationality Act as well as his substantive and procedural due process rights. *See* ECF Doc. 1. For the reasons discussed in the accompanying memorandum of law, Mr. Rodelo now seeks the issuance of an Order to Show Cause, as well as an order that he be released from physical custody. Accordingly, Mr. Rodelo moves under 28 U.S.C. § 2243 and Federal Rule of Civil Procedure 65 for the following order:

1. Order Respondents to forthwith respond to the petition for a writ of habeas corpus within three days or another period deemed reasonable;
2. Enter an Order requiring Mr. Rodelo’s release from immigration custody unless and until there is a significant likelihood of removal in the reasonably foreseeable future;

3. Grant further and additional relief as the Court deems just and appropriate.

If a hearing is set on this motion or the petition itself, since Mr. Rodelo's pro hac vice attorney is out-of-state, undersigned counsel for Mr. Rodelo respectfully moves the Court to allow for counsel's remote participation.

Respectfully submitted this 5th day of September, 2025

/s/ Jessica Dawgert
JESSICA DAWGERT
Partner, Federal Litigation
Blessinger Legal PLLC
7389 Lee Highway, Suite 320
Falls Church, VA 22042
jdawgert@blessingerlegal.com
(703) 738-4248
Pro Hac Vice

/s/Sara A. Johnson
SARA A. JOHNSON
Law Office of Sara A. Johnson
700 Camp St.
New Orleans, LA 70130
(504) 330-4333
sara@sarajohnsonlaw.com
Local Counsel

CERTIFICATES OF COMPLIANCES AND SERVICE

I certify that this pleading complies with the font requirements and word limits of the Federal Rules of Civil Procedure in that it was prepared in Times New Roman 14 point font and contains 207 words.

I hereby certify that on 9/5/2025, I filed the foregoing motion with the CM/ECF system, and I hereby certify that I have sent this filing to the Government Respondents at the following address:

Acting United States Attorney
Western District of Louisiana
U.S. Attorney's Office
300 Fannin Street, Suite 3201
Shreveport, LA 71101

/s/ Jessica Dawgert
JESSICA DAWGERT
Partner, Federal Litigation
Blessinger Legal PLLC
7389 Lee Highway, Suite 320
Falls Church, VA 22042
jdawgert@blessingerlegal.com
(703) 738-4248
Pro Hac Vice Counsel