


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

JACIEL CIRRUS ROJAS (A ))
)
Petitioner,)
)
v.)
)
SAMUEL OLSON, Field Office Director, Chicago)
Field Office, Immigration and Customs)
Enforcement; SCOTT SMITH, Jail Administrator,)
Dodge County Jail,)
)
Respondents.)

Case No. 2:25-cv-01437

**OPPOSITION TO RESPONDENTS' EXPEDITED
NON-DISPOSITIVE MOTION FOR STAY OF PROCEEDINGS**

Petitioner, by and through counsel, files his opposition to Respondents' motion for stay of proceedings. In support thereof state as follows:

1. Petitioner is presently detained by Respondents in violation of law and the U.S. constitution.
2. Petitioner's case is not considered a general civil litigation involving the U.S. as a party where this matter should be postponed and held in abeyance.
3. The U.S. Constitution, Article I, Section 9, Clause 2, says the privilege of the writ of habeas corpus "shall not be suspended" except when in cases of rebellion or invasion the public safety may require it.
4. There is no reference to a lapse in appropriations or other considerations that Respondents have outlined in their motion.

WHEREFORE, Petitioner requests that this Court deny Respondents' motion for stay of proceedings.

Dated: October 1, 2025

Respectfully Submitted,
Jaciell Cirrus Rojas

By: s/ Lauren McClure
One of his attorneys

Lauren E. McClure, Esq.
KRIEZELMAN BURTON & ASSOCIATES, LLC
200 West Adams Street, Suite 2211
Chicago, Illinois 60606
(312) 332-2550
lmcclure@krilaw.com