

December 3, 2025

## In re: Emergency Motion for Temporary Restraining Order / Stay of Removal

**Petitioner:** Humberto Romeu-Perez, A# [REDACTED]

**Respondent:** ICE / Port Isabel Detention Center

**Case No.:** Case No. 25-cv-03307-RMR

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### Emergency Motion

I, Lissette de la Paz, respectfully submit this **Emergency Motion for Temporary Restraining Order / Stay of Removal** on behalf of Humberto Romeu-Perez, A# [REDACTED] currently detained at **Port Isabel Detention Center, Texas**, who is **at imminent risk of removal to Mexico** and unable to access counsel at this time.

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### Background

**1. Pending Habeas Corpus Petition:**

A federal habeas petition is pending in the **U.S. District Court for the District of Colorado** (Case No. 25-cv-03307-RMR) filed on **October 22, 2025**, and received by Aurora Detention Center on **November 20, 2025**, while Humberto Romeu-Perez was detained at **Aurora Detention Center, Colorado**. The Court retains jurisdiction.

**2. Recent Transfers:**

Mr. Humberto Romeu-Perez has been transferred multiple times since June 21, 2025. Most recently:

- **November 11, 2025:** Transferred to **Florence, Arizona**
- **November 16, 2025:** Returned to **Aurora, Colorado**
- **November 28, 2025:** Transferred to **Arizona**; he was **not interviewed or informed of next steps**
- **December 2, 2025:** Transferred to **Port Isabel Detention Center, Texas**, without communication

**3. During his last stays in Arizona and now Texas, no ICE officials have spoken with him regarding his case, raising serious due process concerns.**

**4. Risk of Irreparable Harm:**

Removal at this time would:

- Interfere with federal court jurisdiction,

- Prevent Mr. Humberto Romeu-Perez from participating in or benefiting from his pending habeas action,
  - Violate the purpose of the habeas filing, and
  - Cause irreparable harm, including return to a country where he fears for his life.
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**Legal Basis**

- **Ex parte Endo, 323 U.S. 283 (1944)** and subsequent federal precedent prohibit removal of a detainee with a pending habeas petition because it interferes with federal court jurisdiction and access to justice.
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**Relief Requested**

Petitioner respectfully requests that the Court:

1. **Issue an emergency temporary restraining order / stay of removal**, preventing any transfer or deportation of Mr. Humberto Romeu-Perez;
  2. **Order immediate return to Aurora Detention Center, Colorado**, where the habeas petition was filed and jurisdiction exists;
  3. Grant any further relief the Court deems just and proper.
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**Certification of Urgency**

This motion is filed **urgently** due to **imminent risk of removal from Port Isabel, Texas**, before the pending habeas petition can be adjudicated.

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**Respectfully submitted,**

Lisette de la Paz, Spouse of Humberto Romeu-Perez

 / [ddgfla@gmail.com](mailto:ddgfla@gmail.com)



