



III.

Petitioner's counsel has done everything within her power to facilitate posting of bond and Petitioner's release. Specifically, on the morning of December 23, 2025, Petitioner's counsel contacted Assistant U.S. Attorney Ann Cruce-Haag and advised her that the online government system would not allow Petitioner to post a bond. Not until 2:07 p.m., less than an hour before the Government's daily deadline for posting bond, the government system updated to allow Petitioner to post bond. Petitioner's son signed the bond contract and submitted confirmation of wire transfer on the online government system by 3:30 p.m. on December 23, 2025. Petitioner's counsel immediately contacted Ms. Cruce-Haag to advise that bond had been posted, but Respondents did nothing.

Continuing into the morning through late afternoon of December 24<sup>th</sup>, 2025, Petitioner's counsel contacted Ms. Cruce-Haag, the Laredo detention facility where Petitioner is held, and Department of Homeland Security (DHS) Enforcement and Removal Operations (ERO) supervisor for the Laredo office Juan Garza to advise them that bond had been posted, and under the terms of this Court's order, Petitioner was to be released forthwith.

Petitioner remains detained. Respondents have done nothing to procure her release. By refusing to release Petitioner from their custody, Respondents have defied this Court's order.

Petitioner respectfully requests emergency relief in the form of an order that Respondents release Petitioner from confinement immediately.

DATE: December 25, 2025.

Respectfully submitted,

FISCHER & FISCHER, ATTORNEYS AT LAW

/s/ Amelia Ruiz Fischer  
AMELIA RUIZ FISCHER  
Texas Bar No. 24080087  
Email: arf@fischerfischerlaw.com  
*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

By my signature below, I hereby certify that on this 25<sup>th</sup> day of December, 2025, a true and correct copy of the above and foregoing **PETITIONER'S EMERGENCY MOTION TO ENFORCE WRIT OF HABEAS CORPUS**, as well as any and all attachments thereto, was served on all parties of record by electronically filing the same with the Court using the Court's CM/ECF system, including on the following parties.

/s/ Amelia Ruiz Fischer

Amelia Ruiz Fischer  
Counsel for Petitioner