

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

Danyil Kybukevych,

Petitioner,

v.

1:25-cv-00242

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department of
Homeland Security,

Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,

Immigration and Customs Enforcement,

Miguel Vergara, Director, Harlingen Field
Office Immigration and Customs Enforcement

and,

Warden of Port Isabel Service Detention
Center.

[PROPOSED] ORDER TO SHOW CAUSE

TO THE ABOVE-NAMED RESPONDENTS:

PLEASE TAKE NOTICE, that upon the Verified Petition for a Writ of Habeas Corpus of Amanda Waterhouse, Esq., and David Wilson, Esq., filed October 24, 2025, the exhibits and affidavits attached thereto, and upon all pleadings and proceedings herein, along with the Motion for an Order to Show Cause filed October 30, 2025, the Respondents or their attorneys are hereby ORDERED TO SHOW CAUSE to this Court, on the _____ day of _____, 2025 at _____ o'clock of that day, or as soon thereafter as counsel can be heard, why an Order should not be entered granting Mr. Danyil Kybukevych ("Petitioner") the following relief:

1. Granting Petitioner a writ of habeas corpus directing Respondents to immediately release Petitioner from custody

It is THEREFORE ORDERED THAT, by the aforementioned date and time, Respondents show cause why this court should not grant Petitioner's writ of habeas corpus. Failure to appear or respond will result in an Order granting Petitioner the aforementioned relief.

Dated: _____

Signed: _____