

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JORGE STEFANO ALEXANDER
HUAMAN-RODRIGUEZ,

Petitioner,

v.

ROBERT LYNCH, Detroit Field Office
Director for U.S. Immigration and Customs
Enforcement, in his official capacity; TODD
LYONS, Acting Director of U.S. Immigration
and Customs Enforcement, in his official
capacity; and KRISTI NOEM, Secretary of the
U.S. Department of Homeland Security, in her
official capacity,

Respondents.

Case No. 1:25-cv-1330-RJJ-RSK

Hon. Robert J. Jonker
United States District Court Judge

Hon Ray S. Kent
United States Magistrate Judge

PETITIONER'S MOTION FOR LIMITED DISCOVERY

Petitioner Jorge Huaman-Rodriguez, by and through his undersigned counsel, respectfully moves this Honorable Court to authorize limited discovery in this ongoing habeas corpus action, specifically to require Respondents to produce the bodycam footage of his unlawful stop and arrest on October 15, 2025 at a weigh station in Indiana. In support of his motion, Petitioner states as follows:

1. A petitioner seeking relief under § 2241 must show that “[h]e is in custody in violation of the Constitution or laws and treaties of the United States.” 28 U.S.C. § 2241(c)(3).
2. Habeas corpus actions are unique. The liberal discovery mechanisms contained in the Federal Rules of Civil Procedure do not automatically apply.

3. “A habeas petitioner...is not entitled to discovery as a matter of ordinary course.” *Bracy v. Gramley*, 520 U.S. 899, 904, 117 S.Ct. 1793, 138 L.Ed.2d 97 (1997); *see also Harris v. Nelson*, 394 U.S. 286, 295, 89 S.Ct. 1082, 22 L.Ed.2d 281 (1969) (holding that the “broad discovery provisions” of the Federal Rules do not apply in habeas corpus proceedings).

4. Rather, Rule 6(a) of the Rules Governing Section 2254 Cases provides that “[a] judge may, for good cause, authorize a party to conduct discovery under the Federal Rules of Civil Procedure and may limit the extent of discovery.”

5. Under this “good cause” standard, a federal district court may grant leave to conduct discovery in habeas corpus proceedings only “where specific allegations before the court show reason to believe that the petitioner may, if the facts are more fully developed, be able to demonstrate that he is...entitled to relief.” *Bracy*, 520 U.S. at 908-09, 117 S.Ct. 1793 (quoting *Harris*, 394 U.S. at 300, 89 S.Ct. 1082); *see also Williams v. Bagley*, 380 F.3d 932, 974-75 (6th Cir. 2004); *Stanford v. Parker*, 266 F.3d 442, 460 (6th Cir. 2001).

6. Consequently, a habeas petitioner must overcome the good-cause hurdle before engaging in discovery.

7. In response to the Order to Show Cause in this matter, Respondents claim that the Petitioner’s arrest “...was supported by a valid I-200 arrest warrant...” PageID.47. On information and belief, the “valid I-200 arrest warrant” was completed after the Petitioner was stopped, he was not stopped on the basis of a warrant.

8. Respondents further submitted an I-213 which Petitioner alleges contains material misrepresentations of fact. Specifically, the I-213 states that the encounter was consensual, and that the Petitioner “does not claim fear of returning to his country of citizenship” and “wished to be returned to Peru.” PageID.86.

9. Petitioner's version of events is that he was stopped without cause (i.e., without a warrant in violation of a consent decree) in an encounter that was not consensual, and that he said no such thing regarding his fear of return to Peru and his purported desire to be returned to Peru.

[Exhibit 1 – Spanish-language Declaration of Jorge Huaman-Rodriguez, with English-language translation]

10. On information and belief, the agent(s) of the Respondents who stopped the Petitioner were wearing body cameras at the time of his detention.

11. On Friday, November 7, 2025, Counsel for the Petitioner contacted counsel for Respondents via e-mail, cc:ing class counsel in *Castañon Nava, et al., v. DHS*, (1:18-cv-03757, N.D. Illinois) to advise that this motion would be filed, and to request the preservation of the body camera footage of the Petitioner's stop, arrest and detention.

12. The disputed facts between the parties could be conclusively settled if this Honorable Court were to require the production by the Respondents of the body camera footage of the Petitioner's stop, arrest and detention.

On the basis of the foregoing, the Petitioner respectfully requests that this Honorable Court grant limited discovery and order Respondents to produce to the Petitioner the bodycam footage of his detention and arrest on October 15, 2025.

Dated: November 13, 2025

Respectfully submitted,

s/ Amy Maldonado
Amy Maldonado (IL ARDC # 6256961)
Managing Attorney
Law Office of Amy Maldonado LLC
333 Albert Ave., Suite 390
East Lansing, MI 48823-4351
Tel. (517) 803-2870
Fax: (888) 299-3780
Email: amy@amaldonadolaw.com

s/ Adriana Klemish

Adriana Klemish (MI Bar No. P86742)
Associate Attorney
Law Office of Amy Maldonado LLC
333 Albert Ave., Suite 390
East Lansing, MI 48823-4351
Tel. (517) 803-2870
Fax: (888) 299-3780
Email: adriana@amaldonadolaw.com

ATTORNEYS FOR PETITIONER