UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Carlos Anibal Chalco-Beltran,

Petitioner,

v.

LaDeon Francis, *et al.*,

Respondents.

No. 1:25-cv-09205-ALC

NOTICE OF MOTION

PLEASE TAKE NOTICE that Petitioner Carlos Anibal Chalco Chango, a.k.a. Carlos Anibal Chalco-Beltran, hereby moves this Court to order his immediate release pending the resolution of his petition for writ of habeas corpus pursuant to *Mapp v. Reno*, 241 F.3d 221 (2d. Cir. 2001). In support of this motion, Petitioner respectfully submits a Memorandum of Law and Exhibit and he further refers the Court to the filings in support of his Amended Petition, also filed this evening, as referenced.

Petitioner's counsel has been in contact with Respondents' counsel since Friday and earlier today advised Respondents of Petitioner's intent to file the instant motion. Respondents have not yet provided their position.

ECF-stamped copies of this filing, including the notice of motion, memorandum of law, declaration and exhibits and proposed order will be provided to Respondents' counsel via email immediately after filing. Counsel will also provide a courtesy copy tomorrow in accordance with the Court's rules.

Dated: November 9, 2025

Respectfully submitted,

/s/ Harold A. Solis
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Counsel for Petitioner

CERTIFICATE OF SERVICE

I certify that on November 9, 2025, I electronically filed the attached the foregoing Notice of Motion and accompanying Proposed Order, Memorandum of Law and exhibit with the Clerk of the Court for the United States District Court for the Southern District of New York using the CM/ECF system. Service will therefore be effected by the CM/ECF system.

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