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U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

NOV 17 2025

UNITED STATES DEPARTMENT OF JUSTICE
IMMIGRATION COURT

South Louisiana ICE Processing Center
3843 E Stagg Avenue
Basile, LA 70515

BY: DANIEL J. McCOY, CLERK
D.S.

November 8th, 2025

IN THE MATTER OF: **Carolina Herrera Soriano**

A-File No.: 

TO HONORABLE: U.S. District Court for the Western District of Louisiana

RESPONSE PRO SE MOTION to Terminate Mandatory ICE Detention

I, Caronila Herrera Soriano, proceeding Pro Se at this time, respectfully files a motion requesting this honorable U.S. District Court for the Western District of Louisiana to Terminate my mandatory ICE Detention. I am currently detained and residing at: South Louisiana ICE Processing Center, 3843 E Stagg Avenue, Basile, LA 70515. I am hereby also requesting your assistance in submitting back to me a final disposition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241 hereby submitting. I have been in immigration mandatory detention for well over 90 days after my "Order of the Immigration Judge" was finally issued on June 30th, 2025. The order of removal to my home country, or alternatively a third country, has not been executed nor processed. Detainee willfully wishes to depart from the United States pursuant to the order of removal.

Detainee hereby tests the legality of my deportation order and the failure to process my removal, therefore bringing a writ of habeas corpus action in front of this honorable Western district court of Louisiana. I have been detained by ICE (Immigration Customs Enforcement) beyond the removal period authorized by statute, which is 90 days. ICE is not likely to remove me in the near future. Detainee has made countless attempts and queries to ICE's deportation officers through the internal detainee "ICE Requests" submissions in order to follow-up about the status of my removal, however I have not receive any indication of my removal moving in a timely manner. ICE is depriving me of my right to liberty/freedom. I have been detained by ICE for a prolonged period. My deportation order delay is in violation of due process clause of the first amendment to the U.S. Constitution.

Detainee herewith is asking for review of my order of removal; detainee is hereby challenging the decision for ICE to exceed my detention in the first place and seeks release from

unjust immigration detention. I am not challenging the immigration judge's decision of removability as determined. I am aware that my detention pending removal is final, however I am firmly challenging the statutory framework that permits my detention without valid explanation and further review. I believe that is clear I am within my rights to constitutionally challenge to the legislation authorizing my detention without immigration law justification. I wish this honorable U.S. District Court for the Western District of Louisiana to exercise jurisdiction over my habeas corpus claim, hence reviews my petition and allows for due process.

I am presenting to this honorable district court with this habeas corpus seeking relief because my detention pending removal has become prolonged. My period of mandatory detention is not reasonable in length; there is no valid explanation as to why my continued detention is necessary, hence this detention is clearly violating the Due Process Clause if 'the continued detention became unreasonable or unjustified' the Department of Homeland Security "mandatory, bureaucratic detention of aliens under § 1226(c) was intended to apply for only a limited time". In my case, as of today, I have been deprived of my liberty by the government for a period of over 90 days, it is constitutionally doubtful that Congress may authorize immigration detention of this duration for aliens who are subject to removal. I hereby ask again to this district court to grant the writ unless the government within 60 days of this petition provides a hearing before an Immigration Judge with the power to grant bail unless the government establishes that I am a flight risk or will be a danger to the community, which I am not, never have been. My case surpassed the reasonable period of time required to initiate and conclude removal proceedings promptly. Given that my actual removal is not reasonably foreseeable, as a deportable alien I cannot not be indefinitely detained without a government showing of a strong special justification, constituting more than a threat to the community, that overbalances my liberty interest, and reasonableness of the length of detention is subject to review by federal courts in habeas proceedings. Because there is no strong special justification in my case, because the period of time required to conclude my removal proceedings remains unreasonable, and because my actual removal is not foreseeable, I hereby affirm I have valid grounds for this district court to consider granting of the writ of habeas corpus.

I understand the importance of ensuring public safety and be in compliance with the US law. I have always been a responsible contributing member of society: dedicated hard-working woman, taxpayer and devoted support pillar to my family. In light of my personal circumstances, I humbly ask to grant my motion for termination of my mandatory ICE detention. I ask for your clemency, understanding and compassion in considering my case closure as soon as administratively possible. I hope you will take into consideration my sincere commitment to making things right and my dedication to my family during this difficult time. I

understand the importance of maintaining the integrity of the US laws, but I also believe that compassion and understanding of individual circumstances can play a significant role in achieving a just outcome. I am requesting that you use your discretion to allow due processing of my case, which will permit me to continue with my immigration removal proceedings and also allow me to eventually continue providing essential care for my family as well as contribute to the community in a meaningful way. Thank you for your time, consideration, and understanding of my situation. I hope you will give my motion request due consideration and offer me relief from immigration detention.

RESPECTFULLY SUBMITTED,

X  _____

Carolina Herrera Soriano

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