

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

WILSON ISRAEL CAAL-PUTUL,

Petitioner,

v.

Todd LYONS, in his capacity as Acting  
Director, Immigration and Customs  
Enforcement; Kristi NOEM, Secretary, U.S.  
Department of Homeland Security; Pamela  
BONDI, U.S. Attorney General; EXECUTIVE  
OFFICE FOR IMMIGRATION REVIEW;  
Carlos CISNEROS, Assistant Field Office  
Director of Harlingen Field Office for U.S.  
Department of Homeland Security, United  
States Immigration and Customs Enforcement,  
Enforcement and Removal Operations

Respondents.

Case No. 1:25-cv-276

**EMERGENCY MOTION TO SHOW  
CAUSE**

**EMERGENCY MOTION TO SHOW CAUSE**

Petitioner moves for this Court to order Respondents to show cause within 3 days as to why his relief requested in his Petition for Habeas Corpus should not be granted.

DATED this 17th of November 2025.

/s/ Jennifer Scarborough

Law Firm of Jennifer Scarborough  
P.O. Box 18460  
Minneapolis, MN 55418  
Texas State Bar No. 24106401  
SDTX I.D. 3566791  
*Attorney for Petitioner*

**CERTIFICATE OF SERVICE**

I certify that I caused a copy of the foregoing

**EMERGENCY MOTION TO SHOW CAUSE**

to be served on all counsel of record via ECF.

Dated this 17th day of November 2025,

/s/ Jennifer Scarborough

Jennifer Scarborough