

# SA25CA1524 JKP

## PETITION FOR WRIT OF HABEAS CORPUS (EXPEDITED)

I, Gerardo Fidel Zevallos Ramos, respectfully submit this Pro Se Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241, challenging the legality of my ongoing civil immigration detention. I request expedited judicial review because my next immigration hearings are scheduled for December 5, 2025, and December 23, 2025, and I urgently need to be released so that USCIS can adjudicate my pending application for adjustment of status.

I also respectfully ask the Court to excuse any formatting or procedural errors because I am representing myself Pro Se. My detention has prevented me from generating income, and I no longer have the financial resources to hire legal counsel. I am doing everything within my limited means to follow the law and respectfully present my case.

### I. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 2241 because I am “in custody” under the authority of the Department of Homeland Security and I am challenging the legality of that custody. Venue is proper in the Southern District of Texas, San Antonio Division, because I am detained at the South Texas ICE Processing Center in Pearsall, Texas.

### II. PARTIES

Petitioner:  
Gerardo Fidel Zevallos Ramos  
A# [REDACTED]  
South Texas ICE Processing Center  
P.O. Box 1228  
Pearsall, TX 78061

#### Respondents:

- Secretary of the Department of Homeland Security
- Director, ICE Enforcement & Removal Operations
- Warden, South Texas ICE Processing Center
- Any other official having custody over my person

### III. STATEMENT OF FACTS

1. I have lived in the United States for more than thirty-two (32) years, since the age of four.
2. I have been married to my U.S.-citizen spouse, Maribel Zevallos, since 2017.
3. I am the father of five U.S.-citizen daughters, all minors.

FILED

NOV 17 2025

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [REDACTED]  
DEPUTY CLERK

4. My family resides at [REDACTED] Garland, Texas 75043, which is also my residence upon release.
5. I operated a small business, Z Concrete Services, and filed federal taxes every year from 2006 through 2023.
6. ICE detained me on September 1, 2025, and I have been detained for more than three months without a bond hearing.

### **A. Approved I-130 and Pending I-485 Adjustment of Status**

7. On September 4, 2025, USCIS approved my Form I-130, confirming my eligibility for lawful permanent residence.
8. My Form I-485 (Application for Adjustment of Status) remains pending.
9. I also have a pending EOIR-42B Application for Cancellation of Removal.

### **B. ICE Interference With My Required I-693 Medical Exam**

10. My **first** medical exam appointment was missed because ICE transferred me between facilities overnight.
11. My **second** appointment was missed because the detention facility did not transport me.
12. After these delays, my Deportation Officer, J. Flores, contacted my wife and **requested proof** that I was required to obtain a medical exam.
13. My wife sent him **the I-485 interview notice and my approved I-130**, which he received.
14. Despite having this proof, ICE did not release me or help facilitate the medical exam.
15. I ultimately completed the **I-693 medical exam**, and USCIS now has what it needs to adjudicate my case.

### **C. Upcoming Immigration Hearings**

16. I have a **pre-trial hearing on December 5, 2025** and a **final hearing on December 23, 2025**.
17. I have never missed a court date and remain fully compliant.

## **IV. LEGAL BASIS — FIFTH AMENDMENT DUE PROCESS VIOLATION**

18. Under the **Fifth Amendment Due Process Clause**, civil detention must remain **reasonably related** to its purpose and cannot become arbitrary or punitive.
19. My detention has become **unreasonably prolonged**, and ICE has no lawful justification to continue holding me.

20. I am not a danger or flight risk. I have:

- A U.S.-citizen spouse
- Five U.S.-citizen children
- Thirty-two years of residence
- Employment history and tax records
- A stable residence at [REDACTED]

21. My detention violates the principles established in *Zadvydas v. Davis*, 533 U.S. 678 (2001).

## V. REQUEST FOR EXPEDITED JUDICIAL REVIEW

22. I respectfully request **expedited review** because my next immigration hearings are imminent (Dec 5 & Dec 23).
23. Prolonged detention prevents me from assisting in my case and from allowing USCIS to adjudicate my I-485.
24. My family is experiencing extreme emotional and financial hardship.

## VI. RELIEF REQUESTED

I respectfully request that this Court:

1. **Order my immediate release under supervision; OR**
2. **Order ICE/EOIR to provide me with a bond hearing within 14 days; AND**
3. **Grant any other relief this Court finds just and proper.**

If I am released, I will reside with my family at:

[REDACTED]

Garland, TX 75043

## VII. VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.



Gerardo Fidel Zevallos Ramos

A# [REDACTED]

South Texas ICE Processing Center

Date: 11-13-2025

## VIII. ADDITIONAL NOTIFICATION REQUEST

I respectfully request that the Court and Respondents also send a courtesy copy of any filings, responses, or orders to my spouse at:

**Maribel Zevallos**



Because I may be transferred between detention centers, this ensures I do not miss any deadlines.

## CERTIFICATE OF SERVICE

I, **Gerardo Fidel Zevallos Ramos**, certify under penalty of perjury that on this \_\_\_ day of **November 2025**, I placed a true and correct copy of this **Petition for Writ of Habeas Corpus (28 U.S.C. § 2241 – Expedited Review Requested)** and all attached exhibits into the institutional legal mail system at the **South Texas ICE Processing Center**, for certified mailing to the following:

**Clerk of the Court**

U.S. District Court  
Southern District of Texas – San Antonio Division  
262 W. Nueva St., Room 1-100  
San Antonio, TX 78207

and a copy to:

**U.S. Attorney's Office**

601 NW Loop 410, Suite 600  
San Antonio, TX 78216

I am filing this Petition **Pro Se** because I am currently detained, unable to generate income, and do not have the financial resources to hire counsel. I respectfully request that the Court accept this filing and permit service through institutional mail.

  
**Gerardo Fidel Zevallos Ramos**

A#   
South Texas ICE Processing Center  
P.O. Box 1228  
Pearsall, TX 78061

# **Exhibit A**

## **I-130 APPROVAL NOTICE**