

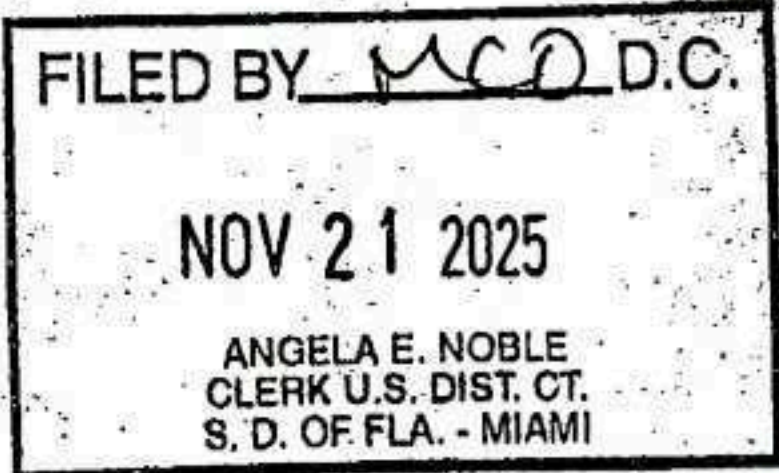
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

IN RE:

RICARDO JULIO PÁEZ, A# [REDACTED]

Petitioner.

Case No.: _____



EMERGENCY MOTION TO EXPEDITE HABEAS CORPUS RELIEF

Petitioner, Ricardo Julio Páez, by and through his Next Friend, Fernando Javier Mesquida, respectfully moves this Court for immediate consideration and relief pursuant to 28 U.S.C. § 2241, and states as follows:

• Next Friend Information:

- Name: Fernando Javier Mesquida
- Relationship: Next Friend of Ricardo Julio Páez
- Citizenship: U.S. Citizen
- Address: [REDACTED]
- Phone: [REDACTED]
- Email: mespacorp@yahoo.com

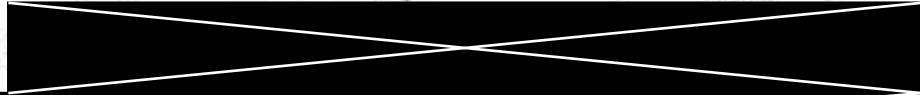
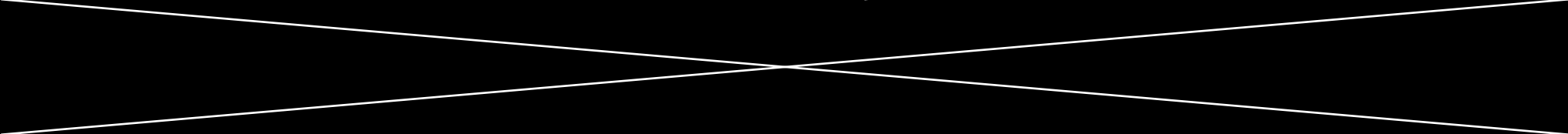
• Petitioner Information:

- Name: Ricardo Julio Páez
- A#: [REDACTED]
- Date of Birth: [REDACTED]
- Detention Location: Krome Detention Center, Florida

• Procedural Background:


- Mr. Páez has been detained at Krome Detention Center since November 1, 2025, following his annual ICE check-in on October 31, 2025.
- He has held withholding of removal status since 2014 and has lawfully resided in the United States since May 2013.

Emergency Basis for Motion:

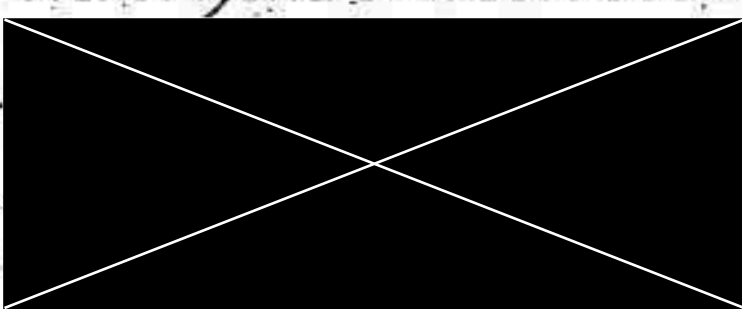
- o Mr. Páez is 66 years old and suffers from 

- o Continued detention imposes severe humanitarian and health risks, and delays could cause irreparable harm.
- o Pursuant to the Court's authority under 28 U.S.C. § 2241, immediate consideration is warranted given the urgent circumstances.
- o While in custody, Petitioner was hospitalized for three days during detention for a suspected pre-heart attack at Krome Detention Center and remains at ongoing risk.
- Relief Requested:
 - o Petitioner respectfully requests that this Court:
 - a. Expedite consideration of the habeas corpus petition;
 - b. Grant immediate release or alternative relief to avoid irreparable harm while the petition is pending;
 - c. Any other relief this Court deems just and proper.
- Conclusion:

For the foregoing reasons, Petitioner respectfully requests that this Emergency Motion be granted immediately.

Respectfully submitted,



Fernando Javier Mesquida
Next Friend of Ricardo Julio Páez



mespacorp@yahoo.com

November 21st, 2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami División

Ricardo Julió Páez Varela, Petitioner

A#

Currently detained at:

Krome North Service Processing Center
18201 SW 12th Street
Miami, FL 33194

Filed through his Next Friend:

Fernando Javier Mesquida

U.S. Citizen

Phone:

Email: mespacorp@yahoo.com

v.

Attorney General of the United States, Respondent
Secretary, U.S. Department of Homeland Security, Respondent
Director of Immigration and Customs Enforcement

PETITION FOR WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241 (Filed by Next Friend)

I. NEXT FRIEND STANDING

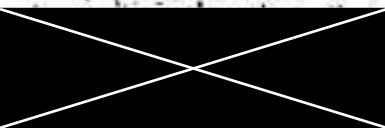
1. Petitioner is detained at Krome SPC and is unable to file this petition himself due to lack of physical access to legal resources, communication barriers, and medical complications suffered while in ICE custody.
2. Fernando Javier Mesquida, a U.S. citizen and Ricardo's brother-in-law, files this petition as Next Friend under *Whitmore v. Arkansas*, 495 U.S. 149 (1990).
3. Fernando has a close and long-standing relationship with Ricardo, has personal knowledge of the case, and is acting solely to protect Ricardo's constitutional rights.

II. JURISDICTION & VENUE

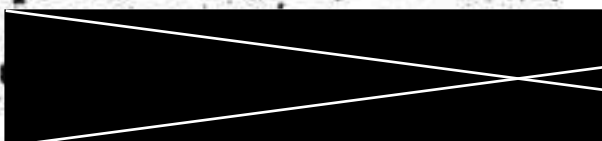
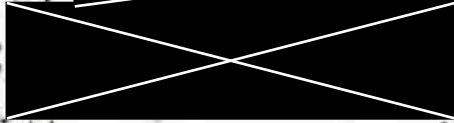
4. This Court has jurisdiction under 28 U.S.C. § 2241.
5. Venue is proper because the detention occurs within the Southern District of Florida.

III. PARTIES

Petitioner:

- Name: Ricardo Julio Páez Varela
- A#: 
- Age: 66
- No criminal record
- Status: Withholding of Removal granted 12/4/2014
- Location: Krome SPC

Next Friend:

- Name: Fernando Javier Mesquida
- Relationship: Brother-in-law
- Citizenship: U.S. Citizen
- Address: 
- Phone: 
- Email: mespacorp@yahoo.com

Respondents:

- Director of Krome SPC
- Secretary of Homeland Security
- Attorney General of the United States

IV. FACTUAL BACKGROUND

11. Ricardo legally entered the U.S. in 2013 through Miami International Airport.
12. He was granted Withholding of Removal on December 4, 2014.
13. He has never been arrested, charged, or convicted of any crime.
14. He complied with all ICE requirements for 11 years.
15. On October 31, 2025, he was detained during a routine ICE appointment.
16. Ricardo is 66 and suffers from health issues; he was hospitalized for three days while detained.
17. ICE has given no lawful explanation for detaining him despite protection and compliance.

V. LEGAL ARGUMENTS

A. Detention is Unlawful Under *Zadvydas v. Davis*

18-20. (As previously written)

B. Detention of a Medically Fragile Senior Is Arbitrary and Punitive

21-22. (As previously written)

C. No Risk of Flight or Danger

23-24. (As previously written)

D. ICE's Detention Serves No Statutory Purpose

25-26. (As previously written)

VI. REQUEST FOR RELIEF

Petitioner respectfully requests:

1. Grant the Writ of Habeas Corpus.
2. Order immediate release under supervision.
3. Alternatively, order a prompt bond hearing.
4. Any other relief deemed just and proper.

VII. DECLARATION OF NEXT FRIEND

I, Fernando Javier Mesquida, declare under penalty of perjury that:

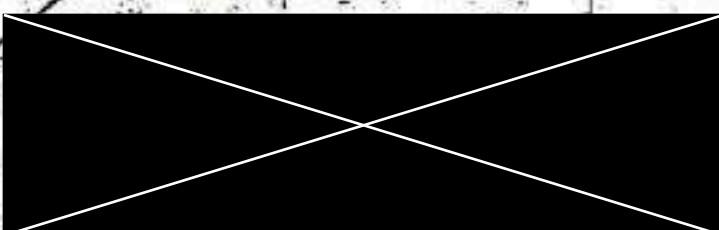
- I am a U.S. citizen and Ricardo's brother-in-law.
- He cannot file on his own due to detention and health issues.
- I am filing solely to protect his constitutional rights.

Dated: November 21st, 2025

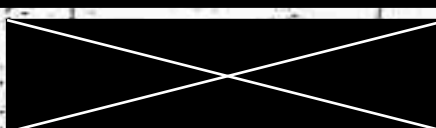
Miami, Florida



Fernando Javier Mesquida
Next Friend and U.S. Citizen



Phone:



Email: mespacorp@yahoo.com

EXHIBITS LIST

- **Exhibit A:** Copy of Withholding of Removal (Dec 4, 2014)
- **Exhibit B:** ICE check-in proof - FORM I-2208
- **Exhibit C:** FDLE background report (2025)
- **Exhibit D:** Mr. Paez Varela ID
- **Exhibit E:** Mr. Paez Venezuelan Passport with USA Visa
- **Exhibit F:** Mr. Paez Varela Form I94 (Entry Admittance)
- **Exhibit G:** Mr. Paez Varela Medical Record (September 2025)

- **Exhibit A:** Copy of Withholding of Removal (Dec 4, 2014)

I hereby certify this to be a True Copy of the Original.

Janeth Jayamillo
Janeth Jayamillo, SLA
1/5/2015

IMMIGRATION COURT
333 SOUTH MIAMI AVE., STE. 700
MIAMI, FL 33130

In the Matter of

Case No.:

PAEZ VARELA, RICARDO JULIO
Respondent

IN REMOVAL PROCEEDINGS

ORDER OF THE IMMIGRATION JUDGE

This is a ~~summary~~ ^{written} of the oral decision entered on 12/02/14.
~~This memorandum is solely for the convenience of the parties. If the proceedings should be appealed or reopened, the oral decision will become the official opinion in the case.~~ 12/02/14
DLJ

- The respondent was ordered removed from the United States to VENEZUELA or in the alternative to .
 - Respondent's application for voluntary departure was denied and respondent was ordered removed to VENEZUELA or in the alternative to .
 - Respondent's application for voluntary departure was granted until upon posting a bond in the amount of \$ _____ with an alternate order of removal to VENEZUELA.
- Respondent's application for:
- Asylum was () granted (denied) withdrawn.
 - Withholding of removal was (denied) granted () withdrawn.
 - A Waiver under Section _____ was () granted () denied () withdrawn.
 - Cancellation of removal under section 240A(a) was () granted () denied () withdrawn.
- Respondent's application for:
- Cancellation under section 240A(b)(1) was () granted () denied () withdrawn. If granted, it is ordered that the respondent be issued all appropriate documents necessary to give effect to this order.
 - Cancellation under section 240A(b)(2) was () granted () denied () withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.
 - Adjustment of Status under Section _____ was () granted () denied () withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.
 - Respondent's application of () withholding of removal () deferral of removal under Article III of the Convention Against Torture was () granted () denied () withdrawn.
 - Respondent's status was rescinded under section 246.
 - Respondent is admitted to the United States as a _____ until _____.
 - As a condition of admission, respondent is to post a \$ _____ bond.
 - Respondent knowingly filed a frivolous asylum application after proper notice.
 - Respondent was advised of the limitation on discretionary relief for failure to appear as ordered in the Immigration Judge's oral decision.
 - Proceedings were terminated.
 - Other: _____

Date: Dec 2, 2014

Denise M. Lane
DENISE M. LANE
Immigration Judge

Appeal Waived/Reserved Appeal Due By:

By Both Parties

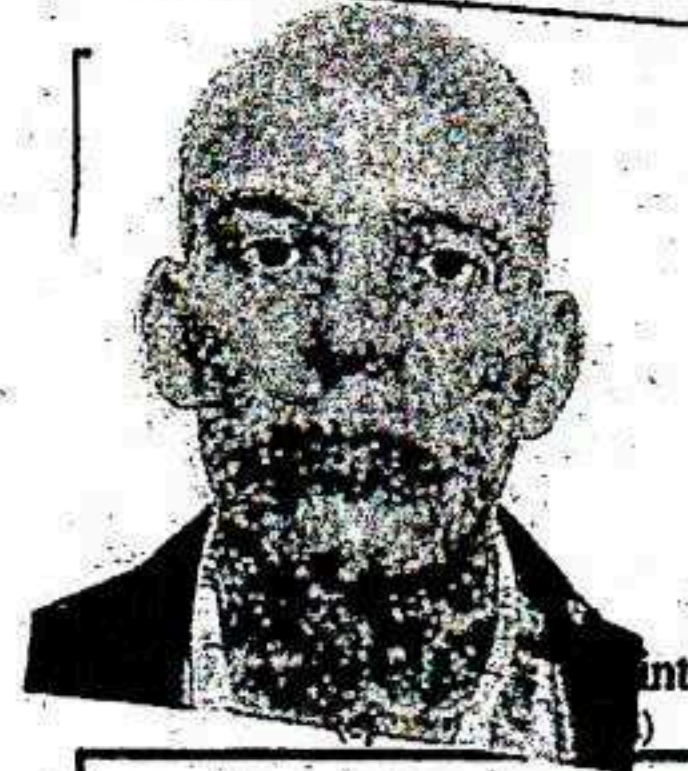
- **Exhibit B: ICE check-in proof (Oct 31, 2025)**

Department of Homeland Security
Immigration and Customs Enforcement

Continuation Page for Form: I-2201

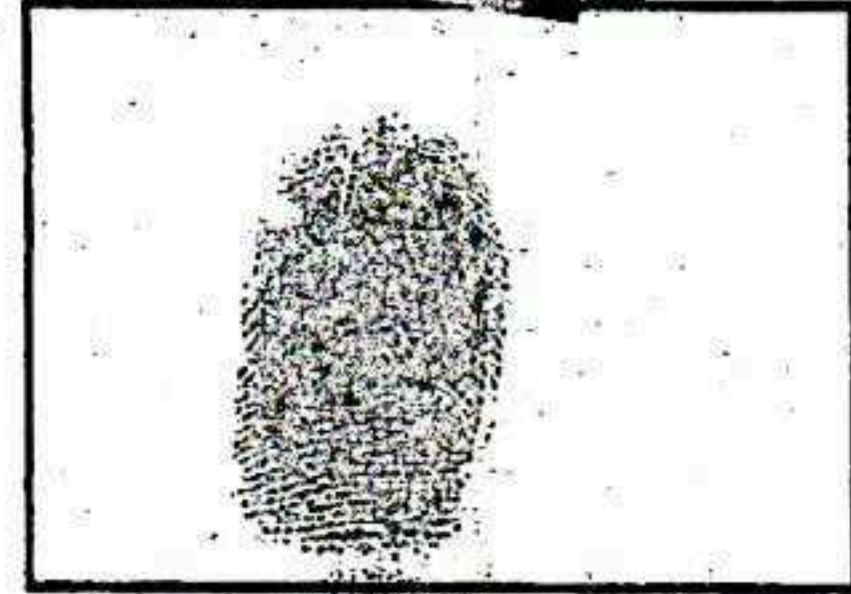
| | | |
|---|----------------------------|----------------------------|
| Alien's Name: PAEZ VARELA, Richard Julio | File Number: [REDACTED] | Date: February 26, 2015 |
|---|----------------------------|----------------------------|

Alien's Signature



Alien's Telephone Number (if any)

Alien's DOB: [REDACTED]
C.O.C. Venezuela



PERSONAL REPORT RECORD

| DATE | NEXT REPORT DATE | COMMENTS/CHANGES |
|----------------|------------------|---|
| Date: 10/2/15 | | Reported to Miramar/ICE/ERO/negative NCIC OFFICER: # 9/29/16 @ 7AM |
| Date: 9/29/16 | | Reported to Miramar/ICE/ERO/negative NCIC OFFICER: # 9/28/17 7AM |
| Date: 9/28/17 | | Reported to Miramar/ICE/ERO/negative NCIC OFFICER: # 11/28/17 @ 7am |
| Date: 11/28/17 | | Reported to Miramar/ICE/ERO/negative NCIC OFFICER: # 7/25/18 @ 7 |
| Date: 7/25/18 | | Reported to ICE Miramar ERO/Negative NCIC/NRD 12/27/18 @ 9AM |
| Date: 11/26/19 | | Reported to ICE-Miramar ERO/Negative NCIC/NRD 11/24/2020 @ 11AM |
| Date: 10/28/24 | | Reported to ICE Miramar ERO/Negative NCIC/NRD 11/31/2020 @ 9AM |
| Date: 10/28/24 | | Reported to Miramar/ICE/ERO/negative NCIC OFFICER: # 10/31/25 8AM @ @ |

| | |
|-----------|--|
| Signature | Title Immigration Enforcement Agent |
|-----------|--|

- **Exhibit C: FDLE background report (2025)**



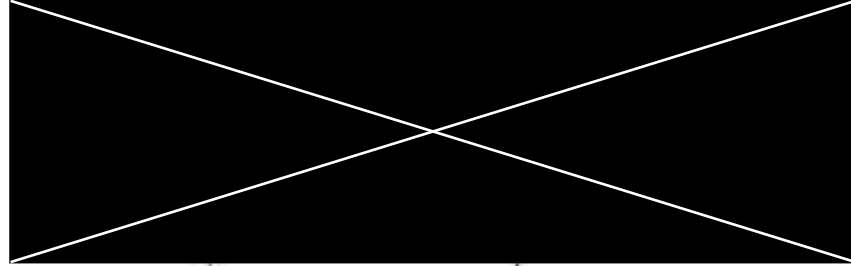
Florida Department of Law Enforcement

J. Mark Glass
Commissioner

Ron DeSantis, Governor
James Uthmeier, Attorney General
Blaise Ingoglia, Chief Financial Officer
Wilton Simpson, Commissioner of Agriculture

September 26, 2025

RICARDO JULIO PAEZ VARELA



Dear Sir or Madam:

Based on the information provided, a search through the files of the Florida Department of Law Enforcement has returned no Florida record for the following individual:

RICARDO JULIO PAEZVARELA
A.K.A.- RICARDO JULIO PAEZ

Race - Unknown

Sex - Male

DOB -




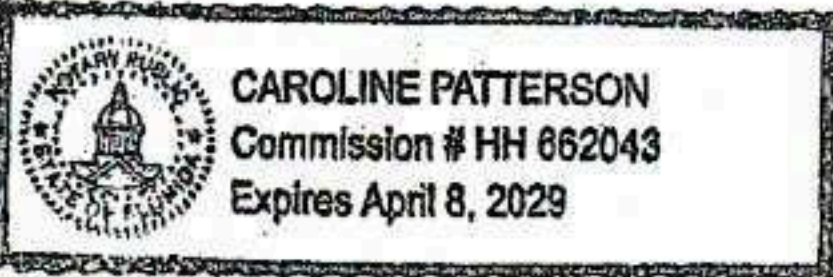
SSN -

Failure to supply the required information (name, race, sex and date of birth) will greatly reduce our chances of reasonably associating your subject with a possible record in our extensive files. If we may be of further assistance, do not hesitate to contact Criminal History Services at (850) 410-8161.

Sincerely,

Tillman Lewis
Criminal Justice Information Analyst II
Criminal History Services

TL/aw

| | |
|---|--|
|  | STATE OF FLORIDA COUNTY OF LEON  Administrator, Criminal History Services Florida Dept. of Law Enforcement Sworn and subscribed before me by means of <input checked="" type="checkbox"/> physical presence or <input type="checkbox"/> online notarization, this <u>26</u> day of <u>September</u> , 20 <u>25</u> By <u>Tillman Lewis</u> , who is personally known to me.  |
|  | |

FLORIDA DEPARTMENT OF LAW ENFORCEMENT
CRIMINAL JUSTICE INFORMATION SYSTEMS

SHIELD CRIMINAL RECORD CHECK SYSTEM

* TRANSACTION LISTING FOR C00151333 *

CUSTOMER:

BATCH: 20250926001

| SEQ-NBR | APPLICANT NAME | RESULT | DOB | RAC | SEX | SSN | CONTROL NBR |
|---------|---------------------------|-----------|------------|-----|-----|------------|-------------|
| 1 | PAEZVARELA, RICARDO JULIO | NO RECORD | [REDACTED] | U | M | [REDACTED] | 19595 22489 |

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TRANSACTIONS**

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