

UNITED STATES DISTRICT COURT

United States Courts
Southern District of Texas
FILED

SOUTHERN DISTRICT OF TEXAS – HOUSTON DIVISION

NOV 26 2025

Mario Jose Mora Contreras

Nathan Ochsner, Clerk of Court

Petitioner,

v.

Case No. 4:25-cv-05646

Kristi Noem, in her official capacity,

Respondent.

PRO SE CONSOLIDATED NOTICE OF EVENTS AND EMERGENCY MOTION FOR
COURT ACTION

I, MARIA ISABEL MORA CONTRERAS, respectfully submit this consolidated pro se filing as Next Friend of my brother, Mario Jose Mora Contreras, who is detained by ICE, has no access to counsel, and cannot meaningfully file documents on his own. I am providing this filing in simple and clear language, as I am not a lawyer, but I ask the Court to consider the facts and the urgency of the situation.

INFORMATION ABOUT THE PETITIONER

Name: Mario Jose Mora Contreras

A-Number: 

Date of Birth: 

Country of Origin: Venezuela

Current Status: Detained by ICE in MONTGOMERY PROCESSING CTR (IHSC), 806 Hilbig Rd. Conroe, TX 77301

According to his official I-94 record, my brother entered the United States lawfully:

Class of Admission: VHP (Venezuelan Humanitarian Parole)

Entry Date: April 15, 2023

Valid Until: April 13, 2025

Before the parole expired, he filed a timely affirmative asylum application with USCIS Receipt Number [REDACTED] application still pending, received a valid Employment Authorization Document, lived at the same address, had no criminal record, and remained fully compliant with his immigration obligations.

When ICE detained him on November 21st, 2025, he had no Notice to Appear (NTA) and no immigration court case.

THE HABEAS PETITION WAS FILED BEFORE ANY NTA OR EOIR CASE EXISTED

This federal habeas petition was filed on November 24, 2025. At that exact moment there was no NTA; there was no removal case, EOIR showed “No Case Found” and ICE’s Online Detainee Locator showed “Call ICE for Details.”

My brother was simply detained without process. Later that same day, after the habeas petition was already filed, ICE suddenly issued an NTA and EOIR created a removal case with a first hearing scheduled for January 5, 2026, before Judge Greenbaum in Conroe, Texas.

This means, ICE created the NTA after the habeas filing, not before. I respectfully ask the Court to consider this.

PETITIONER FITS THE NATIONWIDE CLASS IN MALDONADO BAUTISTA v. SANTACRUZ

Two federal court decisions were issued recently in Maldonado Bautista v. Santacruz U.S. District Court, Central District of California, Order Granting Partial Summary Judgment: November 20, 2025, Class Certification Order: November 25, 2025

These rulings held:

1. DHS may not treat individuals who are *inside* the United States, and who were *not* stopped at the border, as “applicants for admission” under 8 U.S.C. §1225(b)(2).
2. Such individuals must fall under 8 U.S.C. §1226(a), which permits custody review and bond.

3. A nationwide class ("Bond Eligible Class") was certified for noncitizens who: lack current lawful status, entered or will enter without inspection, were not apprehended at arrival, and are not subject to §1226(c), §1225(b)(1), or §1231.

Although my brother originally entered with parole, after parole expiration: he was inside the country, he was not arrested at arrival, he has no criminal grounds, he is not in expedited removal, he did not have a final order of removal and he was detained without any NTA at the time of arrest.

Therefore, Petitioner fits the nationwide class definition.

The detention authority used by ICE in this case is the same one the court in *Maldonado Bautista* declared unlawful.

EMERGENCY MOTION FOR IMMEDIATE RELEASE

Because his detention began without any legal authority, ICE created the NTA only after the habeas petition, the federal class action has already declared the detention policy unlawful, he had a pending asylum case and a valid work permit, he has no criminal record, and ICE may transfer him at any moment.

I respectfully request that this Court order: Immediate release, because ICE lacked statutory authority to detain him and continues to lack such authority.

Or alternatively:

A custody review or bond hearing under §1226(a) within 48 hours.

MOTION TO STAY THE IMMIGRATION COURT CASE

Because the habeas petition was filed first, and the NTA and removal case were created later, I ask the Court to: Stay all immigration court proceedings, including the January 5, 2026, hearing, until this habeas case is resolved. This will prevent ICE from rushing forward with proceedings created after the habeas.

MOTION TO STOP ANY TRANSFER

I respectfully request an order that ICE not transfer my brother while this habeas case is pending, so the Court's jurisdiction is protected and he can communicate with family.

MOTION TO STRIKE OR WITHDRAW THE NTA

Because the NTA did not exist at the time of arrest, did not exist at the time of habeas filing, appears to have been issued as a reaction to the habeas, and resulted from detention based on a policy that a federal court has already declared illegal,

I respectfully ask that ICE be ordered to strike or withdraw the NTA, or at minimum, that the Court declare the NTA has no effect on this habeas proceeding.

MOTION TO RESTORE STATUS BEFORE ARREST

Before his detention, my brother was a timely affirmative asylum applicant, with a valid work permit, living peacefully at the same address, with no immigration court case, and not under any statutory detention authority.

I ask the Court to order restoration of his prior status, including recognition of his pending asylum and EAD.


REQUEST TO INVALIDATE EOIR PROCEEDINGS CREATED AFTER HABEAS FILING

Because the immigration court case did not exist until after the habeas petition, I respectfully ask that the Court Invalidate the EOIR removal proceedings, including the upcoming January 5, 2026, hearing, because they arose from an unlawful detention, they were created post-habeas, they contradict the findings of the class action.

REQUEST FOR ANY OTHER RELIEF

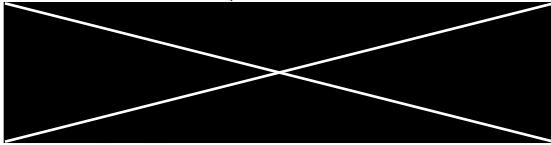
As a pro se Next Friend, I respectfully ask for any additional relief the Court believes is fair or necessary.

Respectfully submitted,



MARIA ISABEL MORA CONTRERAS

Next Friend for Petitioner



Email: 

Date: 11/26/2025

 For: **MARIO JOSE MORA CONTRERAS**



U.S. Customs and Border Protection
Securing America's Borders

Most Recent I-94

Note to employers, local, state or federal agency granting benefits:

Please visit the CBP I-94/I-95 Website and click on the tab for "Get Most Recent I-94/I-95" to perform a search for the applicant to confirm that the biographic and travel information displayed on this I-94/I-95 printout matches the "Get Most Recent I-94/I-95" returned results for this applicant. Reference the CBP I-94/I-95 Website FAQs.

Admission I-94 Record Number: 

Arrival/Issued Date: 2023 April 15

Class of Admission: VHP

Admit Until Date: 2025 April 13

Details provided on the I-94 Information form:

Last/Surname: MORA CONTRERAS

First (Given) Name: MARIO JOSE

Birth Date: 

Document Number: 

Country of Citizenship: Venezuela

- ▶ Effective April 26, 2013, DHS began automating the admission process. An alien lawfully admitted or paroled into the U.S. is no longer required to be in possession of a preprinted Form I-94/I-95. A record of admission printed from the CBP website constitutes a lawful record of admission. See 8 CFR § 1.4(d).
- ▶ What to do if someone requests your admission info: If an employer, local, state or federal agency requests admission information, present your admission (I-94/I-95) number along with any additional required documents requested by that employer or agency.
- ▶ For security, close your browser after retrieving your I-94/I-95 number.



**U.S. Citizenship
and Immigration
Services**

MENU

Case Status Online

Application Is Pending

Your application with USCIS is pending.

For information related to the 180-Day Asylum EAD Clock and the Form I-765, Application for Employment Authorization, please review: [The 180-Day Asylum EAD Notice](#).

Enter Another Receipt Number

Check Status

Already have an Account? [Login](#)

Create an Account? [Sign up](#)

DHS PRIVACY NOTICE PAPERWORK REDUCTION ACT

Related Tools

Change of Address



An official website of the United States government

[Here's how you know](#) ▼



EOIR | Automated Case Information

Court Closures Today November 26, 2025

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

[Home](#) > **MORA CONTRERAS, MARIO JOSE**



Automated Case Information

Name: MORA CONTRERAS, MARIO JOSE | A-Number:



| Docket Date: 11/24/2025



Next Hearing Information

Your upcoming **MASTER** hearing is on **January 5, 2026 at 8:30 AM.**

JUDGE

Greenbaum, Scott V.

COURT ADDRESS

806 HILBIG RD SUITE 2-300

CONROE, TX 77301



Court Decision and Motion Information



This case is pending.



BIA Case Information

No appeal was received for this case.



Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS

806 HILBIG RD SUITE 2-300

CONROE, TX 77301

PHONE NUMBER

(936) 520-5400

[Archive](#)

[Accessibility](#)

[Information Quality](#)

[Privacy Policy](#)