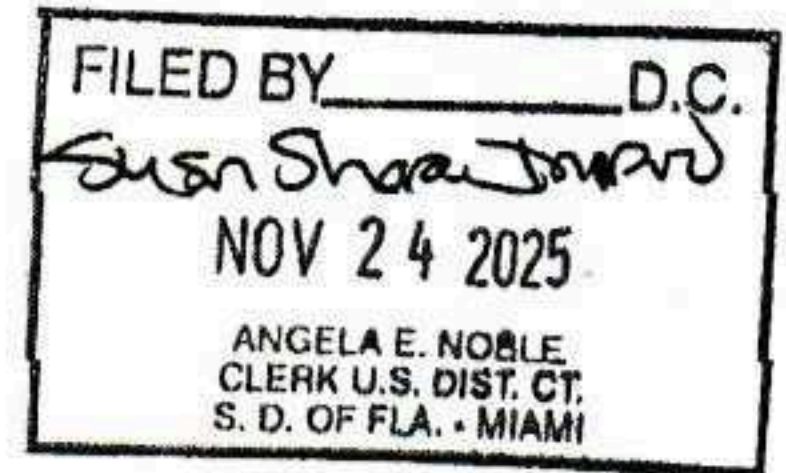


PETITION FOR WRIT OF HABEAS CORPUS
Under 28 U.S.C. § 2241

I, **Antonia Pilay**, respectfully file this Petition for Writ of Habeas Corpus on behalf of my adult son, **Luis Adrián Álvarez Pilay**, acting as his lawful Next Friend, and state the following:



I. JURISDICTION

This Court has jurisdiction pursuant to **28 U.S.C. § 2241**, as the detainee is currently held under federal custody within the Southern District of Florida. His continued detention violates the **Due Process Clause of the Fifth Amendment**.

II. PARTIES

A. Petitioner / Next Friend

- Name: Antonia Pilay
- Address: [REDACTED]
- Phone: [REDACTED]
- Relationship: Mother

B. Detainee / Real Party in Interest

- Name: Luis Adrián Álvarez Pilay
- Date of Birth: [REDACTED] (22 years old)
- Nationality: **Ecuadorian**
- A#: [REDACTED]
- Case No.: [REDACTED]
- B#: [REDACTED]
- P#: [REDACTED]
- Current Location:

Detention facility identified by the detainee as **“Alligator Alcatraz”**.

The official name and address shall be confirmed by ICE upon Court order.

C. Respondents

ICE, DHS, and the Warden/Director of the detention facility.

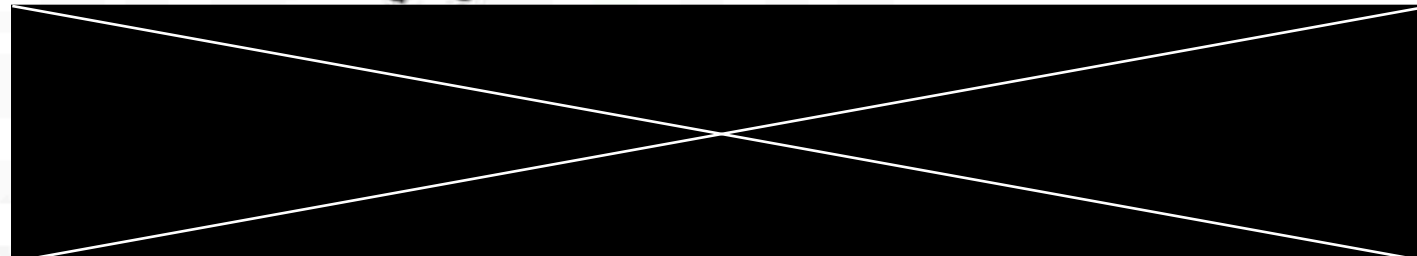
III. NEXT FRIEND DECLARATION

I, **Antonia Pilay**, declare under penalty of perjury:

1. My son has **no access to pen, paper, phone, mail, or legal materials**, preventing him from filing this petition himself.
2. He suffers from **epilepsy**, requiring immediate neurological evaluation.
3. He has **severe myopia**, and without glasses he is at constant risk.
4. He suffers from **depression and anxiety**, worsened by detention.
5. He has not received his **medication or glasses**.
6. His physical and mental health are in **immediate danger**.
7. He has complied with immigration requirements and poses **no danger**.
8. As his mother, I am the proper and lawful Next Friend.

IV. FACTS

1. The detainee was taken into ICE custody on **November 7, 2025**, due to an **administrative error** involving an ISAP-required photograph.
2. He suffers from **epilepsy**, and an **urgent MRI** was ordered by his medical provider.
3. He suffers from **severe myopia** and remains without glasses.
4. He suffers from **depression and anxiety**, with documented psychiatric history.
5. He is under psychiatric care at:



This facility holds his complete psychiatric file.

6. He has received no medication, no glasses, no medical evaluation, and no psychiatric care.
-

7. He has no access to legal communication methods.
8. His physical and mental health are rapidly deteriorating.
9. His detention is unnecessary, punitive, and unconstitutional.
10. Luis Adrián is **Ecuadorian**, and entered the U.S. on **April 1, 2024** seeking safety and medical stability.

V. LEGAL CLAIMS

His continued detention violates:

- The **Fifth Amendment Due Process Clause**
- The prohibition on **punitive civil detention**
- ICE's obligation to provide medical and psychiatric care
- Principles of humane treatment in immigration custody

VI. PRAYER FOR RELIEF

Petitioner respectfully requests that this Court:

1. Order the **immediate release** of Luis Adrián Álvarez Pilay;
2. Or, in the alternative, order his **release under supervision**;
3. Recognize Petitioner as his lawful **Next Friend**;
4. Require ICE to provide urgent neurological and psychiatric evaluation and treatment;
5. Grant any further relief deemed just and proper.

VII. DECLARATION UNDER PENALTY OF PERJURY

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

Signature: Antonia Pilay

Antonia Pilay

Date: 11/21/2025

Antonia Pilay

[REDACTED]
Miami, FL

Phone: [REDACTED]

Recipients:

Alligator Alcatraz Detention Center

U.S. Immigration and Customs Enforcement (ICE)

Subject: Humanitarian Request for Release of My Son

Luis Adrián Álvarez Pilay – A# [REDACTED] – Case No.

[REDACTED]

Dear Officers,

My name is **Antonia Pilay**, mother of **Luis Adrián Álvarez Pilay**, born on [REDACTED], who is currently being held at the Alligator Alcatraz Detention Center due to administrative issues related to his immigration case.

My son recently contacted me by **phone**, informing me that he is wearing an **identification wristband**, which includes the numbers **B#:** [REDACTED], to identify him within the detention system. I want to ensure you have all the correct information to locate him and understand the seriousness of his situation.

I am writing to you with a mother's heart, filled with worry and fear for my son's life. He is suffering **physically and emotionally**, and his health is in **imminent danger**. What he is experiencing in detention is not just an inconvenience—it is a **real threat to his life and well-being**.

Medical and Emotional Conditions

Luis Adrián has suffered from **epilepsy** since early childhood, a condition that can be life-threatening if he does not receive immediate medical attention. His doctor, **Raquel**

[REDACTED]
[REDACTED] Miami, FL 33173), has **urgently ordered an MRI and other diagnostic tests** to assess recent possible episodes that could be serious.

He also suffers from **severe myopia (the highest recorded level)**. Without his glasses, he can barely see, making him extremely vulnerable inside the detention center and unable

to move safely.

Luis Adrián also struggles with **depression and anxiety**, conditions that have worsened due to confinement. He receives psychiatric care at [REDACTED] located at [REDACTED] **Miami, FL 33170**, phone [REDACTED], where he is evaluated and supported by his psychiatrist.

I personally went to the **Miramar detention center**, where he was previously held, to deliver **his glasses and medication**, essential for his safety and health, which he never received. He is now **without his glasses and medication**, pleading for help that he does not receive. Every day he remains in these conditions is a **serious risk to his physical, emotional, and mental health**, and it breaks my heart that I cannot protect him in a place that is supposed to ensure his safety.

Compliance, Character, and Aspirations

Luis Adrián is an **honorable, diligent, and kind-hearted young man**. He has always been respectful, hardworking, and determined to succeed. His only goal in coming to this country was to **seek help and build a dignified future**, escaping the hardships and dangers he faced in his home country.

It is important to highlight that **his failure to submit the ISAP photograph on time was not due to negligence or disobedience**, but occurred because of **the medical and emotional challenges he faces**, including epilepsy, anxiety, and depression, which make completing tasks under pressure or in stressful situations extremely difficult. His inability to submit the photo on time **does not reflect his character or intentions**, but the real impact of his health conditions on his daily life.

He has always fulfilled his obligations, including paying taxes, and has maintained exemplary conduct. While participating in the **ISAP (Intensive Supervision Appearance Program)**, he attended his scheduled appointment on **Friday, November 7, 2025, between 9:00 and 10:00 a.m.** However, due to this **unintentional administrative error**, he was detained that same day, **without any intent to evade immigration procedures or cause harm**.

Luis Adrián entered the United States on **April 1, 2024**,

through **Patrol Sector H, Rio Grande Valley, Texas,**
seeking only **protection, education, and the opportunity**
to grow in peace.

Humanitarian Request

I implore you, with the desperation and love of a mother, to consider the **humanitarian release** of my son. **Luis Adrián poses no danger to the community**, and his detention is the result of an administrative error, without any criminal implications.

As his mother, I commit to receiving him in my home, caring for him with all my love, and ensuring he receives **continuous medical and psychological care**, including his glasses and medication. I also guarantee that he will comply with all immigration obligations while his case is pending.

Attached to this email are **medical reports and test orders** that demonstrate the urgency and severity of his condition. Every day he remains detained is **a day in which his health, emotional stability, and life are at risk**, and I fear deeply for his well-being.

I respectfully ask that you consider this case **with humanity, empathy, and justice**. Releasing Luis Adrián under supervision or bond would give him a real chance to recover, continue his treatment, study, and live with dignity while his immigration process continues.

I cannot stand by while my son suffers in conditions that could be prevented. **I plead with you to act with compassion and restore his opportunity to live and grow safely and with hope.**

With all respect, love, and hope, I deeply appreciate your time, attention, and understanding.

Sincerely,

Antonia Pilay *Antonia Pilay*
Mother of Luis Adrián Álvarez Pilay

Phone: 