

DEC 1 2025 AM 9:33  
FILED - USDC - NDTX - AM

Evidence.

Tracking Number: \_\_\_\_\_

Date Sent: November 22, 2025

## EMERGENCY MOTION FOR IMMEDIATE RELEASE

I, **Hayver Gutierrez**, respectfully submit this Emergency Motion requesting the immediate release of **Merly Fernanda Chaparro Guerrero** (A# XXXXXXXXXX) currently detained by DHS/ICE at the Bluebonnet Detention Facility.

The detainee has an active and pending political asylum case, originally scheduled for February 2028. ICE unexpectedly moved her court date to December 9, 2025 without justification. She complied with all ICE check-ins for years, and during her most recent check-in — which she attended voluntarily — she was arrested without warning.

She poses no danger to the community and has no criminal record. She works legally, pays taxes, and possesses a valid work permit and Social Security number. Continued detention constitutes unnecessary hardship and violates her due process rights.

Petitioner urgently asks the Court to order her immediate release pending resolution of her immigration case, as detention is unwarranted and excessively punitive under the circumstances.

Respectfully submitted,

**Hayver Gutierrez**

## HUMANITARIAN SUPPORT LETTER

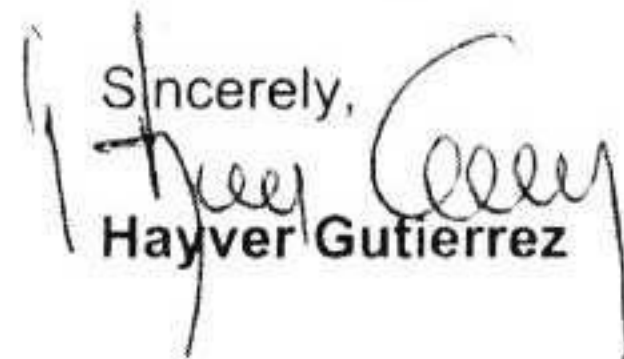
To Whom It May Concern,

My name is **Hayver Gutierrez**, a United States citizen, and I am writing this letter to offer my full humanitarian support for **Merly Fernanda Chaparro Guerrero** during her current detention.

She is my current girlfriend, and we plan to marry in the near future. I take full responsibility for providing her with stable housing, food, transportation, and emotional

support. She is an honest, hardworking woman with no criminal history and has always complied with immigration requirements.

Her detention is causing extreme emotional distress and instability. I respectfully request that she be released into my care as I can ensure her full compliance with future immigration court appearances and all legal obligations.

Sincerely,  
  
Hayver Gutierrez