

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

DEC 29 2025 AM 10:38
FILED - USDC - FLMD - FTM

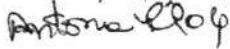
Case No 2:25-cv-01120 **EMERGENCY MOTION FOR STAY OF REMOVAL**

Petitioner **Luis Adrian Pilay** (A-Number: ) a native and citizen of Ecuador, by and through his mother and next friend, **Antonia Pilay Macías**, respectfully moves this Honorable Court for an **Emergency Stay of Removal**.

Petitioner is currently detained by U.S. Immigration and Customs Enforcement (ICE) and faces imminent removal following a negative credible fear determination affirmed by an Immigration Judge. A federal habeas corpus petition pursuant to 28 U.S.C. § 2241 is pending before this Court, with the Government ordered to respond by **December 23, 2025**. Removal prior to judicial review would render this action moot and cause irreparable harm.

WHEREFORE, Petitioner respectfully requests that this Court issue an immediate Emergency Stay of Removal prohibiting ICE and DHS from removing Petitioner while judicial review is pending.

/s/ Antonia Pilay Macías
Date: December 23, 2025



CASE NO: 2:25-cv-01120