

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PLINIO DIAZ MUNDARAIN, Petitioner v. GRANT DICKEY, et al, Respondents,	§ § § § § § § § §	Civil Action No. 4:25-cv-05970
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EMERGENCY EX PARTE APPLICATION FOR IMMEDIATE RELEASE

Petitioner respectfully moves for immediate release pending resolution of contempt proceedings, and shows:

1. This Court has already determined that Petitioner’s detention lacks lawful basis.
2. The Court’s conditional release deadline has expired.
3. Respondents have falsely represented compliance.
4. Continued detention is unlawful, punitive, and irreparable.

Courts routinely order release where government actors refuse to comply with habeas relief. No further process is required.

REQUESTED RELIEF

Petitioner respectfully requests that the Court:

- ORDER Petitioner’s immediate release forthwith, pending resolution of contempt; or
- Alternatively, set an emergency hearing within 24 hours.

Respectfully submitted,

/s/ Matthew R. Mendez

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Attorney for Petitioner

CERTIFICATE OF SERVICE

On January 13, 2026 Counsel for Plaintiff served a copy of the attached document via email, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the Respondent, Pam Bondi, in her Official Capacity as Attorney General of the United States, at USATXS.CivilNotice@usdoj.gov.

/S/ Matthew Mendez
Matthew Mendez

01/13/2026
Date