

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

HARIM SIFUENTES, §

*Petitioner,* §

v. §

Civil Action No.

KRISTI NOEM, Secretary, U.S. Department §  
of Homeland Security; §

**APPLICATION FOR  
ISSUANCE OF ORDER  
TO SHOW CAUSE**

JUAN AGUDELO, Field Office §  
Director of Enforcement and Removal §

Operations, Harlingen Field Office, §  
Immigration and Customs Enforcement; §

CARLOS CISNEROS, Assistant Field §  
Office Director of Enforcement and §

Removal Operations, Harlingen Field Office §  
Immigration and Customs Enforcement; §

TODD LYONS, Acting Director, §  
Immigration and Customs Enforcement; §

PAMELA BONDI, U.S. Attorney General, §  
in their official capacities, §

*Respondents.* §

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1. Pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests that this Court “forthwith” issue an order directing Respondents to show cause why the petition for a writ of habeas corpus filed by Petitioner pursuant to 28 U.S.C. § 2241 should not be granted.

2. Petitioner challenges the basis for his ongoing detention without a bond hearing. *See* Petition for Writ of Habeas Corpus, Dkt. No. 1.
3. The federal habeas corpus statute provides that “[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” 28 U.S.C. § 2243.
4. Section 2243 further provides that the writ or order to show cause “shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed.”
5. Section 2243 further provides that the court shall hold a hearing on the writ or order to show cause “not more than five days after the return unless for good cause additional time is allowed.”
6. In addition, Section 2243 states that the court “shall summarily hear and determine the facts, and dispose of the matter as law and justice require.”
7. Pursuant to Section 2243, Petitioner respectfully requests that the Court immediately issue an Order to Show Cause directing Respondents to file a return within three days of the Court’s order, showing cause, if any, why the writ of habeas corpus should not be granted, and provide Petitioner an opportunity to file a reply within three days after Respondents file the return.

8. Giving Respondents additional time to respond is inappropriate in this case because Petitioner faces irreparable harm due to deprivation of his physical liberty.

DATED: December 19, 2025.

Respectfully submitted,

By: /s/ Jaime Diez

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