



MOTION TO INTERVENE AS NEXT FRIEND

'25CV3820 AGS MSB

(EXPEDITED — To Protect Procedural and Constitutional Rights Pending Habeas Relief)

UNITED STATES DISTRICT COURT

FIDEL FLOREZ PEREZ, by Next Friend *Jesus Rios Tello*
Petitioner,

v. *Pamela Bondi, U.S. Attorney General*
Christopher La Rose, warden - Kristi Noem, Secretary of Homeland Security
Respondent. et al

Case No.:

MOTION TO INTERVENE AS NEXT FRIEND (EXPEDITED)

COMES NOW [Your Full Legal Name], nephew of Petitioner [Uncle's Full Name], and respectfully moves this Court for leave to intervene as **Next Friend**, for the limited and urgent purpose of protecting Petitioner's **procedural and constitutional rights pending adjudication of habeas corpus relief**, and states as follows:

I. NEXT FRIEND STANDING

1. Petitioner is currently detained by U.S. Immigration and Customs Enforcement and lacks meaningful ability to access this Court.
2. Petitioner faces barriers including detention, restricted communication, and language limitations.
3. Movant is Petitioner's **nephew**, a close family member with a significant relationship and a demonstrated dedication to Petitioner's best interests.
4. Intervention satisfies the requirements for Next Friend standing under *Whitmore v. Arkansas*, 495 U.S. 149 (1990).

II. LIMITED PURPOSE OF INTERVENTION

This Motion is **narrowly tailored** to:

- Prevent irreparable harm caused by continued unlawful detention;
- Preserve Petitioner's due process rights;
- Permit filing and prosecution of an accompanying 28 U.S.C. § 2241 habeas petition seeking immediate release.

This Motion does **not** seek to replace or interfere with existing counsel.

III. EXPEDITED CONSIDERATION

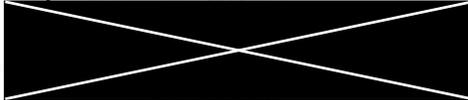
Petitioner remains unlawfully detained. Each day of continued custody constitutes an ongoing deprivation of liberty in violation of the Fifth Amendment.

WHEREFORE, Movant respectfully requests that the Court grant leave to intervene as Next Friend and consider this Motion on an expedited basis.

Respectfully submitted,



JESUS RIOS TELLO
Nephew / Next Friend



Date: 12/30/2025
