

EMERGENCY MOTION FOR IMMEDIATE REVIEW AND RELEASE

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF PENNSYLVANIA

ELOISIO MEDEIROS DE FREITAS, Petitioner, by and through his next friend
LARA CAMPOS DE FREITAS,

v.

WARDEN, MOSHANNON VALLEY PROCESSING CENTER, et al.,

Respondents.

Civil Action No.: _____

EMERGENCY MOTION FOR IMMEDIATE REVIEW AND RELEASE

Petitioner, proceeding pro se, respectfully moves this Court for emergency review and states:

1. Petitioner is currently detained by ICE at Moshannon Valley Processing Center under a final order of removal.
2. Petitioner has lived in the United States for approximately 21 years, has strong family and community ties, and supports three children educated in the United States.

3. Petitioner has fully complied with all immigration requirements and poses no flight risk or danger.
4. Petitioner's continued detention without an individualized custody determination violates the Fifth Amendment Due Process Clause.
5. Each additional day of detention causes irreparable constitutional harm, justifying immediate judicial intervention.

WHEREFORE, Petitioner respectfully requests that this Court:

- A. Expedite review of the Petition for Writ of Habeas Corpus;
- B. Order immediate release from custody;

OR, IN THE ALTERNATIVE,

- C. Order a prompt and constitutionally adequate custody/bond hearing;
- D. Grant any other relief deemed just and proper.

Date: 01/05/2026

Signature: Lara Campos de Freitas

LARA CAMPOS DE FREITAS
Next Friend for Petitioner