

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

FILED  
John E. Triplett, Clerk of Court  
United States District Court  
*By amduke at 12:12 pm, Jan 06, 2026*

JORGE ALBERTO GALEANO NAVARRETE,  
Petitioner,

v.

TAYLOR JONES,  
Field Office Director,  
U.S. Immigration and Customs Enforcement,

MERRICK B. GARLAND,  
Attorney General of the United States,  
Respondents.

Civil Action No. \_\_\_\_\_

**MOTION FOR IMMEDIATE RELEASE**

**INTRODUCTION**

Petitioner, Jorge Alberto Galeano Navarrete, by and through his Next Friend, Maritza Claribel Sánchez Guzmán, respectfully moves this Honorable Court for an Order of Immediate Release pending adjudication of his Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241.

**LEGAL STANDARD**

Federal courts possess inherent authority to order immediate release where detention is unconstitutional. See *Mapp v. Reno*, 241 F.3d 221 (2d Cir. 2001); *Zadvydas v. Davis*, 533 U.S. 678 (2001).

**ARGUMENT**

I. Petitioner Was Arrested Without a Judicial Warrant in Violation of the Fourth Amendment.

II. Petitioner Poses No Flight Risk or Danger to the Community.

III. Continued Detention Exacerbates Serious Medical Conditions.

IV. Pending Asylum and Parole Status Strongly Favor Release.

Courts routinely order release where detention lacks individualized justification and causes irreparable harm.

### **IRREPARABLE HARM**

Petitioner suffers from a serious cardiac condition resulting in tachycardia. Continued detention poses immediate risk to his life and constitutes irreparable harm.

### **REQUEST FOR RELIEF**

WHEREFORE, Petitioner respectfully requests that this Court order his immediate release from ICE custody, or in the alternative impose appropriate conditions of supervision.

Respectfully submitted,



Maritza Claribel Sánchez Guzmán

Next Friend of Petitioner



Date: 12-29-25