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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
ARLINGTON DIVISION

1:26-cv-018-H

MOTION TO EXPEDITE CONSIDERATION
OF PETITION FOR WRIT OF HABEAS CORPUS
28 U.S.C. § 2241

NOW COMES Petitioner, JOSE LEONARDO MORILLO GONZÁLEZ ("Petitioner"), by and through his Next Friend, LESLI PAMELA GUTARRA OSORIO ("Next Friend"), and respectfully moves this Honorable Court for an Order expediting the consideration and adjudication of the Petition for Writ of Habeas Corpus, and in support thereof states as follows:

I. INTRODUCTION

1. This Motion seeks expedited review due to ongoing and severe constitutional violations, including unlawful detention, denial of medical care, and inhumane conditions of confinement, which require immediate judicial intervention.

II. FACTUAL BASIS FOR EXPEDITED REVIEW

2. Petitioner is currently detained at the Bluebonnet Detention Facility in Anson, Texas.
3. Petitioner remains in ICE custody despite the absence of any criminal charges.
4. Petitioner has suffered serious medical issues, gastrointestinal illness, infections, and untreated pain due to denial of adequate medical care.
5. Petitioner has been subjected to punitive and unjustified solitary confinement, posing a substantial risk to his physical and mental health.
6. Conditions of confinement include restricted access to potable water and spoiled food, creating an urgent risk to Petitioner's health and safety.

III. LEGAL STANDARD

7. Federal courts possess inherent authority to control their dockets and expedite proceedings where justice so requires. See *Landis v. North American Co.*, 299 U.S. 248 (1936).
8. Habeas corpus petitions alleging unconstitutional detention warrant prompt judicial review due to the fundamental liberty interests at stake. See *Preiser v. Rodriguez*, 411 U.S.

475 (1973).

IV. ARGUMENT

9. Continued delay will result in irreparable harm to Petitioner, including deterioration of health and ongoing violations of constitutional rights.
10. The balance of equities strongly favors expedited consideration, as Respondents will not be prejudiced by prompt review.
11. The public interest favors the swift resolution of claims involving unlawful detention and government accountability.

V. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

- A. Grant this Motion to Expedite;
- B. Order expedited briefing and consideration of the Petition for Writ of Habeas Corpus;
- C. Grant such other relief as the Court deems just and proper.

Respectfully submitted,



LES LI PAMELA GUTARRA OSORIO
Next Friend for Petitioner