

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

MAR 20 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY KRN
DEPUTY CLERK

ISIDRO CAMPOS PADILLA,

A-Number: 

Petitioner,

v.

WARDEN OF THE SOUTH TEXAS ICE PROCESSING CENTER;
FIELD OFFICE DIRECTOR,
ENFORCEMENT AND REMOVAL OPERATIONS,
SAN ANTONIO FIELD OFFICE,
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT;
SECRETARY OF THE DEPARTMENT OF HOMELAND SECURITY;
U.S. DEPARTMENT OF HOMELAND SECURITY;
ATTORNEY GENERAL OF THE UNITED STATES;
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,

Respondents.

Civil Action No. 5:26-CV-000105-FB

**PETITIONER'S MOTION TO PRESERVE JURISDICTION PURSUANT TO THE ALL
WRITS ACT (28 U.S.C. §1651(a))**

Petitioner, Isidro Campos Padilla, respectfully moves this Court for an order preserving this Court's jurisdiction pursuant to the **All Writs Act, 28 U.S.C. §1651(a)**, and in support thereof states as follows:

1. Petitioner is currently detained at the South Texas ICE Processing Center in Pearsall, Texas.

2. Petitioner has filed a Petition for Writ of Habeas Corpus challenging the legality of his continued detention.
3. This Court has jurisdiction over Petitioner's habeas petition pursuant to **28 U.S.C. §2241**.
4. The jurisdiction of this Court depends on Petitioner's presence within this District at the time of adjudication.
5. Federal courts possess authority under the **All Writs Act, 28 U.S.C. §1651(a)** to issue orders necessary to protect and preserve their jurisdiction.
6. The Supreme Court has recognized that courts may act to prevent actions that would defeat or impair their ability to grant effective relief. See **United States v. New York Telephone Co., 434 U.S. 159 (1977)**.
7. In immigration detention cases, transfer of a detainee outside the jurisdiction of the Court may interfere with or frustrate habeas review.
8. Similarly, removal of a petitioner from the United States during the pendency of habeas proceedings may render the case moot and deprive the Court of the ability to grant effective relief.
9. Petitioner's case presents a live and ongoing challenge to the legality of his detention.
10. The Court's ability to adjudicate that challenge must be preserved.
11. Without protective relief, Respondents retain the ability to transfer Petitioner to another facility outside this District at any time.
12. Respondents also retain the ability to execute Petitioner's removal during the pendency of this action.
13. Either action would risk undermining this Court's jurisdiction and ability to provide meaningful relief.
14. Courts routinely issue orders under the All Writs Act to prevent such jurisdictional interference in habeas cases.
15. The requested relief is limited in scope and designed solely to preserve the status quo while this Court adjudicates the pending Petition.
16. Petitioner does not seek to expand this Court's jurisdiction, but only to protect it.
17. The balance of equities strongly favors granting this relief.
18. Petitioner faces the risk of irreparable harm if transferred or removed before this Court rules on the legality of his detention.

19. Respondents will suffer no prejudice from maintaining Petitioner within this jurisdiction while the Court resolves the pending Petition.
20. The public interest is served by ensuring that federal courts are able to exercise their habeas jurisdiction fully and effectively.
21. Accordingly, relief under the All Writs Act is warranted.

WHEREFORE, Petitioner respectfully requests that this Court:

- a. Pursuant to 28 U.S.C. §1651(a), enter an order preserving this Court's jurisdiction over this matter;
- b. Prohibit Respondents from transferring Petitioner outside the jurisdiction of this Court while this action remains pending;
- c. Enjoin Respondents from executing any removal or deportation of Petitioner during the pendency of this habeas proceeding; and
- d. Grant such other and further relief as this Court deems just and proper.

VERIFICATION

I, Isidro Campos Padilla, declare under penalty of perjury pursuant to 28 U.S.C. §1746 that I am the Petitioner in this action, that I have read the foregoing Motion, and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.

Executed on this 18 day of March, 2026.

Isidro Campos P
Isidro Campos Padilla
A-Number: 

South Texas ICE Processing Center
566 Veterans Drive
Pearsall, Texas 78061