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HARRISBURG, PA

JAN 21 2026

PER 
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**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

MAILAINE ARIANNA PÉREZ GARCÍA,
Petitioner,

v.

WARDEN, MOSHANNON VALLEY ICE PROCESSING CENTER,
Respondent.

**MOTION TO EXPEDITE CONSIDERATION OF PETITION AND PENDING
MOTIONS**

I. INTRODUCTION

Petitioner, by and through her Next Friend, respectfully moves this Honorable Court for an order expediting consideration of the Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, the Motion for Immediate Release, and all related filings.

Extraordinary circumstances exist requiring urgent judicial intervention.

II. GROUNDS FOR EXPEDITED REVIEW

Petitioner is suffering ongoing and irreparable harm as a result of unconstitutional detention. She has experienced severe psychological deterioration, including panic attacks, anxiety, weight loss, and is currently under psychiatric care and medication while detained. Each day of continued detention exacerbates her condition and compounds constitutional injury.

III. LEGAL STANDARD

Federal courts possess inherent authority to manage their dockets and to expedite proceedings where justice so requires. See *Landis v. North American Co.*, 299 U.S. 248 (1936). Habeas corpus actions warrant priority treatment. See *Stack v. Boyle*, 342 U.S. 1 (1951).

IV. ARGUMENT


- A. Petitioner Faces Irreparable Harm Absent Expedited Review.
- B. Petitioner Is Likely to Succeed on the Merits.
- C. The Balance of Equities Favors Expedited Consideration.
- D. Expedited Review Serves the Public Interest.

V. RELIEF REQUESTED

Petitioner respectfully requests that the Court expedite consideration of the Petition for Writ of Habeas Corpus, the Motion for Immediate Release, and any responsive pleadings, and grant such other relief as the Court deems just.

VI. CERTIFICATION AND SIGNATURE

I certify that this motion is made in good faith and based on urgent humanitarian and constitutional concerns.



Liosvanis Martinez Clemente
Next Friend for Petitioner
Date: 01/13/2026