

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

Case No.: 2:26-CV-133-JES-DNJ

MIAKEL GUERRA MORALES,

Petitioner,

v.

KELIE WALKER, in her official capacity as Acting Field Office
Director, Miami Field Office:

KEVIN GUTHRIE, in his official capacity as Executive Director
of the Florida Field Management Division;

TODD LYONS, in his official capacity as Acting Director,
Immigration and Customs Enforcement;

KRISTI NOEM, in her official capacity as Secretary of the
Department of Homeland Security;

Respondents.

**PETITIONER'S UNOPPOSED MOTION FOR LEAVE
TO FILE SUPPLEMENT TO PETITIONER'S REPLY**

COMES NOW, Petitioner Miakel Guerra Morales by and through his undersigned
counsel, and respectfully moves pursuant to Local Rule 3.01 for leave to file supplement
Petitioner's *Reply* and in support thereof states as follows:

1. This case involves a pending petition for *Habeas corpus relief and Request for
Emergency Injunctive Relief* (DE:1).

2. Respondent's have filed a *Response* to the Petition. (DE:9) Petitioner has filed a *Reply* to Respondents' Response. (DE:12).

3. Petitioner seeks leave to file a supplement to the *Reply* in order to (1) file an affidavit from the Petitioner in support of the *Reply*, (2) file additional supporting arguments and supplemental authority to the claims raised by Petitioner, in particular the claims concerning the violations of the regulations under 8 C.F.R. §241.4 and §241.13.

4. Undersigned counsel is a sole practitioner whose work has prevented her from meeting with Petitioner, who is currently detained at the Krome Processing Center in Miami, Florida.

5. Undersigned counsel seeks 10 days in which to file is supplement to the *Reply*

6. This motion is being filed in good faith, with the purpose of presenting to this Court a full and complete briefing of the issues that have been raised. The stakes cannot be higher for Petitioner whose life hangs in the balance as an individual who has received an order from an immigration court granting deferral of removal to Cuba under the Convention Against Torture ("CAT").¹

7. Undersigned counsel has consulted with Kevin Huguelet, the Assistant United States Attorney assigned to this matter who has indicated that he does not oppose the request sought herein.

¹The Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Dec. 10, 1984, S. Treaty Doc. No. 100-20, 1465 U.N.T.S. 85 (entered into force for United States Nov. 20, 1994).

WHEREFORE, Petitioner respectfully moves this Honorable Court for an Order allowing for leave to file a supplement to his *Reply* within 10 days.

I HEREBY CERTIFY that on March 3, 2026, I electronically filed the forgoing with the Clerk of Court using the CM/ECF electronic filing system which will serve a copy on all counsels of record.

Respectfully submitted,

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BY: /s/ Ana Maria Jhones
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