

EMERGENCY MOTION FOR IMMEDIATE CONSIDERATION

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
2026 JAN 26 A 10:58

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I, DIXIMARY MORAN VELÁSQUEZ, respectfully move this Honorable Court for emergency consideration of the pending Petition for Writ of Habeas Corpus, and state as follows:

I. GROUNDS FOR EMERGENCY RELIEF

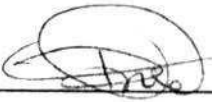
1. Petitioner, Ángel David Casanova Ferrer, has been detained since November 26, 2025, without any immigration hearing, bond hearing, or judicial review.
2. The length of detention without process constitutes irreparable harm, violating the Due Process Clause of the Fifth Amendment.
3. Continued detention without prompt court intervention places the Petitioner at risk of unlawful deprivation of liberty.
4. This motion is urgent because each additional day of detention without a hearing deepens the constitutional violation.

II. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

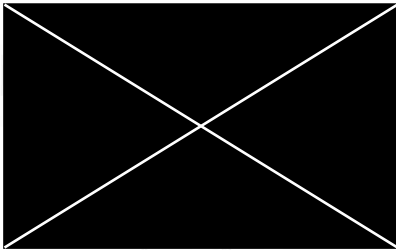
- a. Grant emergency review of the Habeas Corpus Petition;
- b. Order Respondents to promptly respond;
- c. Grant any other relief the Court deems just and proper.

Respectfully submitted,



DIXIMARY MORAN VELÁSQUEZ Spouse

of Petitioner



Date: 01/20/2026

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

ÁNGEL DAVID CASANOVA FERRER

A-Number



Petitioner,

v.

WARDEN, RAY JAMES CORRECTIONAL FACILITY; U.S.

IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE)

Respondents.