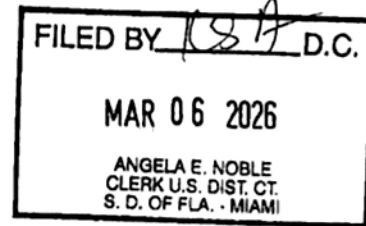


UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA



RENE MATAMORO-MORA,

Petitioner,

v. Case No: 1:26-cv-20646

WARDEN, KROME SERVICE

PROCESSING CENTER, et al.,

Respondents.

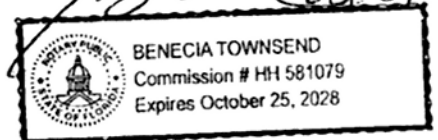
NOTICE OF FILING PETITIONER'S REPLY

Petitioner, RENE MATAMORO-MORA, appearing pro se, hereby gives notice of filing the attached Petitioner's Reply to Respondents' Response to Order to Show Cause, filed in response to the government's submission dated February 12, 2026.

Respectfully submitted,

RENE MATAMORO-MORA

René Matamoros
[Signature]





Krome Service Processing Center

18201 SW 12th St, Miami, FL 33194

Date: February 28, 2026

UNITED STATES DISTRICT COURT

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PETITIONER'S REPLY TO RESPONDENTS' RESPONSE TO ORDER TO SHOW
CAUSE

Petitioner, RENE MATAMORO-MORA, respectfully submits this Reply to Respondents' Response.

I. THE GOVERNMENT HAS NOT PROVEN REMOVAL IS SIGNIFICANTLY LIKELY

Respondents rely on warrants and warnings (Exhibits I, J, K) to suggest removal is imminent. However, under *Zadvydas v. Davis*, the government must show removal is "significantly likely in the reasonably foreseeable future." Respondents have failed to

provide a travel document or a confirmed flight date from the Cuban government.

Notably, Petitioner's record from February 9, 2005, shows that ICE previously classified this case as "Non-repat" and mandated release because removal was not foreseeable.

II. PETITIONER'S 15-YEAR HISTORY PROVES HE IS NOT A DANGER OR FLIGHT RISK

Respondents cite a criminal docket (Exhibit B) to justify detention. This is contradicted by Petitioner's actual history of living under ICE supervision for 15 years, from 2010 to October 1, 2025, with perfect reporting compliance. Petitioner has a stable residence in Homestead and a robust support system. If Petitioner were a danger, the government would not have allowed him to remain in the community for 15 years.

III. PROLONGED DETENTION OF A DISABLED ELDERLY INDIVIDUAL IS PUNITIVE

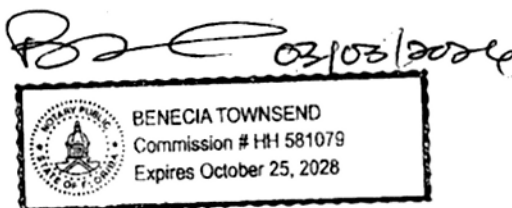
Petitioner is a 70-year-old disabled individual. He suffers from Essential Hypertension, Bipolar Disorder, and Spinal Spondylosis that requires the use of crutches. Continued detention under these physical conditions, where removal is not foreseeable, is punitive and violates the Fifth Amendment Due Process Clause.

CONCLUSION

Petitioner respectfully requests that this Court grant the Writ of Habeas Corpus and order his immediate release.

RENE MATAMORO-MORA

Date: February 28, 2026



CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2026, I placed a true and correct copy of the foregoing Reply and Notice of Filing in the prison mail system at Krome Service Processing Center for delivery via First Class Mail to:

David Werner

Office of the United States Attorney

99 NE 4th Street

Miami, FL 33132

RENE MATAMORO-MORA

A handwritten signature in black ink, appearing to read "Rene Matamoros", written over the printed name.