


United States District Court
For the Western District of Pennsylvania
Wilhelm Paul Teuchert/Petitioner

ICE Field Office
Civil Action No. Reg: 
Judge Peter J Welsh

Emergency motion for temporary relief from
Unconstitutional Civil Detention

Petitioner by and through his fiancée Beatrice Cabeaday acting as next friend, respectfully moves this honorable court for emergency temporary relief from ongoing unconstitutional conditions of confinement, and states as follows:

1. Introduction

- a. Petitioner is a civil immigration detainee, not a criminal inmate, and is not serving a criminal sentence.
- b. On December 3rd, 2025, petitioner was arrested by immigration and customs enforcement (ICE) without notice of any violation despite possession of a valid ICE-issued work permit and never missing a required appointment of report obligation.
- c. Petitioner was informed by immigration counsel that he did not violate immigration law.
- d. Petitioner has never received a bond hearing before an immigration judge.
- e. Petitioner was initially held at a civil immigration detention facility then transferred to USP Lewisburg, a high security federal criminal penitentiary operated by the bureau of prisons.

2. Emergency and irreparable harm

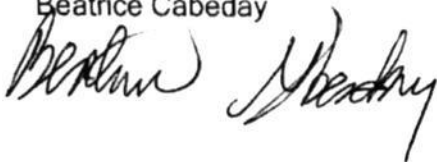
- a. Immigration detention is civil and non-punitive in nature.
- b. Housing a civil detainee in a federal criminal prison constitutes punishment without adjudication in violation of the fifth amendment due process clause.
- c. At USP Lewisburg, petitioner is:
 - i. Subject to extreme security restrictions, house in a coercive and punitive environment. Experiencing severe psychological distress. Suffering restricted access to counsel and family.
- d. These harms are ongoing immediate and irreparable and cannot be remedied by monetary damage.
- e. Continued confinement under criminal conditions serves no legitimate civil purpose and is excessive in relation to any asserted government interest.

3. Likelihood of success on the merits

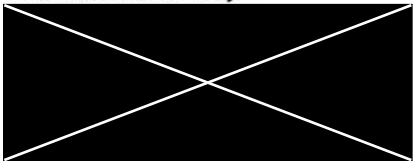
- a. Prolonged civil detention without a bond hearing raises serious constitutional concerns.
 - b. Civil detainees may not be subjected to conditions amounting to punishment.
 - c. The government's 14 years of acquiescence, issuance of work authorizations and continuous supervision created legitimate due process and reliance interests.
 - d. Petitioner's decade old conviction for which he served is sentence and there after lived lawfully under ICE supervision, does not justify present punitive detention.
 - e. The transfer to USP Lewisburg exceeds what is reasonably necessary to effectuate civil immigration objectives.
4. Balance of equities and public interest.
- a. The balance equities weigh heavily in petitioners favor, as he faces ongoing constitutional injury.
 - b. Respondents face no prejudice from providing constitutional injury.
 - c. The public interest is served by ensuring that civil detention does not become too punitive imprisonment.
5. Request for emergency relief
- a. Petitioner respectfully requests that this court order, on an emergency basis.
 - b. An immigration bond hearing before an immigration judge
 - c. Release under appropriate supervision pending resolution of the habeas corpus petition
 - d. Any other relief this court deems just and proper to prevent ongoing constitutional violations.
6. Conclusion
- a. Absent immediate judicial intervention, the petitioner will continue to suffer unlawful punishment as a civil detainee. This motion seeks narrow temporary relief to halt ongoing constitutional harm while the habeas petition is adjudicated.

Respectfully submitted,

Beatrice Cabeday



Beatrice Cabeday



1/29/2026

Clerk of Court
US District Court
Western District of Pennsylvania
700 Grant Street, Suite 3110
Pittsburgh, PA 15219

Re: Civil Action No. Reg# 36779-506

Dear Clerk of Court,

Please accept the enclosed Emergency Motion for Temporary Relief from unconstitutional civil detention, filed in the above reference habeas corpus matter.

This motion is submitted on an emergency basis due to the petitioner's current confinement as a civil immigration detainee housed in a federal criminal penitentiary (US Lewisburg) resulting in ongoing constitutional harm.

Kindly file this motion and place it on the docket for the court's consideration. A copy of this motion has been served upon the US Attorney's Office for the Middle District of Pennsylvania as reflected in the attached certificate of service.

Respectfully submitted,

Beatrice Cabeday
Friend and Fiancé of Petitioner

A handwritten signature in cursive script, appearing to read 'Beatrice Cabeday'.