

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

A.T.L.,

Petitioner,

v.

Warden, STEWART DETENTION  
CENTER, *et al.*,

Respondents.

CIVIL ACTION FILE NO.:

4:26-cv-199-CDL-AGH  
28 U.S.C. §2241

**PETITIONER'S MOTION FOR JUDGMENT ON THE PLEADINGS AND RELIEF**

**PURSUANT TO 28 U.S.C. §2243**

COMES NOW Anjelis Turcios Lopez, Petitioner in the above-captioned matter, by and through his counsel of record, pursuant to Federal Rule of Civil Procedure 12(c) and 28 U.S.C. §2243, hereby submits his Motion for Judgment on the Pleadings and Relief Pursuant to 28 U.S.C. §2243. Petitioner respectfully moves this Court to grant judgment on the pleadings upon the Petition for Habeas Corpus filed and served upon Respondents against Respondents and grant the immediate release of Petitioner from Respondents' custody, and in support thereof shows this Honorable Court the following:

1. Petitioner filed an application for habeas corpus relief on February 3, 2026. Dkt. 1.
2. This court issued an order to show cause on February 3, 2026, directing Respondents show cause within seven (7) days as to why Petitioner's application for habeas relief should not be granted. Dkt. 3.
3. The deadline for Respondents to timely respond and show cause was February 10, 2026.

4. As of the date of this filing, Respondents have failed to timely file a response or show cause as directed by this Court. If Respondents did file a response within the required time, they failed to provide Petitioner with notice of such filing.
5. As Respondents have failed to plead or otherwise show cause within the required timeframe, Petitioner is entitled to judgement on the pleadings and relief pursuant to 28 U.S.C. §2243.

**WHEREFORE**, Petitioner respectfully requests that this Court enter an order:

- a. Declaring that Petitioner's detention Violates the Due Process Clause of the Fifth Amendment and 8 U.S.C. § 1226(a);
- b. Issuing a writ of Habeus Corpus ordering Respondents to release Petitioner immediately; and
- c. Award Petitioner attorney's fees and costs under the Equal Justice Act, and on any other basis justified under law.

Respectfully submitted this 11th day of February, 2026.

*/s/Anthony L. Jaime*

Anthony L. Jaime  
Georgia Bar No: 505393  
The Law Offices of Joseph J. Steffen, Jr.  
223 W. York St,  
Savannah, GA 31401  
anthony@joesteffen.com  
(912) 999-8444  
*Attorney for Petitioner*

*/s/ Frederick Serrano-Jimenez*

Frederick Serrano-Jimenez (Pro Hac  
Forthcoming)  
North Carolina Bar No.: 59778  
Velasquez & Associates, PLLC

107 N. Church St. STE 200  
Durham, NC 27701  
serranojimenez@velasquezlaw.net  
Phone: 919-865-5645  
*Attorney for Petitioner*

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

A.T.L.,

Petitioner,

v.

Warden, STEWART DETENTION  
CENTER, *et al.*,

Respondents.

CIVIL ACTION FILE NO.:

4:26-cv-199-CDL-AGH  
28 U.S.C. §2241

CERTIFICATE OF SERVICE

I hereby certify that a copy of *Petitioner's Motion for Judgment on the Pleadings and Relief Pursuant to 28 U.S.C. §2243* was served upon all parties via the Court's electronic filing system to:

Travis D. Lynes  
Assistant United States Attorney  
United States Attorney's Office  
Middle District of Georgia  
P.O. Box 1702  
Macon, Georgia 31202  
travis.lynes@usdoj.gov  
*Attorneys for Respondents*

Respectfully submitted this 11th day of February, 2026.

/s/Anthony L. Jaime  
Anthony L. Jaime  
Georgia Bar No: 505393  
The Law Offices of Joseph J. Steffen, Jr.  
223 W. York St,  
Savannah, GA 31401  
anthony@joesteffen.com  
(912) 999-8444  
*Attorney for Petitioner*