

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

MIRLA CATALINA BERMUDEZ SALAS,  
*Petitioner,*

v


FRED FIGUEROA (Warden or authorized person having custody of petitioner)  
*Respondents.*

FILED

FEB 02 2026

JOAN KANE, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY KB DEPUTY

**EMERGENCY MOTION TO STAY REMOVAL AND TRANSFER**

Now comes the Petitioner, Mirla Catalina Bermudez Salas (A ) by and through her Next Friend, and respectfully moves this Honorable Court to issue an Emergency Order staying her transfer outside the jurisdiction of this Court and staying any potential removal, pending the resolution of her Petition for Writ of Habeas Corpus. In support, Petitioner states:

1. **Current Status:** Petitioner is currently detained by U.S. Immigration and Customs Enforcement (ICE) in Oklahoma. She has a Master Calendar Hearing scheduled for February 10, 2026.
2. **Residence and Equity:** Petitioner resides in Dallas, Texas, holds a valid Employment Authorization Document (EAD), and has a pending asylum claim. She has no criminal record and has already posted bond for the minor local charge that led to her current detention.
3. **Irreparable Harm:** An immediate transfer to a distant facility would sever Petitioner's access to her legal defense, evidence, and support system, effectively violating her Due Process rights under the Fifth Amendment.
4. **Jurisdiction:** This Court has jurisdiction to maintain the status quo of the Petitioner while the merits of her § 2241 Petition are being reviewed.

**WHEREFORE,** Petitioner respectfully requests that this Court grant this Emergency Motion and order Respondents to refrain from transferring Petitioner out of this District until further order of this Court.

Respectfully submitted,

*Dated: January 27, 2026*

*Scarlet Araujo*  
Scarlet Araujo

*Acting as Next Friend for Petitioner*

**CERTIFICATE OF SERVICE**

I, **Scarlett Araujo Bermudez**, hereby certify that on January 30, 2026, I served a true and correct copy of the Petition for Writ of Habeas Corpus and the Emergency Motion to Stay Transfer to the following party via [specify method, e.g., Priority Mail]:

**United States Attorney's Office  
Western District of Oklahoma**



*Scarlett Araujo .*

**Scarlett Araujo Bermudez**  
*Next Friend for Stefany Araujo Bermudez*