

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

STEFANY ARAUJO BERMUDEZ,
Petitioner,

v.

**FRED FIGUEROA, Warden, Diamondback
Correctional Facility; et al.,**
Respondents.

Case No: CIV-26-179-JD

FILED
FEB 02 2026
JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY naa DEPUTY

EMERGENCY MOTION TO STAY TRANSFER OF PETITIONER

The Petitioner, **Stefany Araujo Bermudez**, by and through her Next Friend, Scarlett Araujo, respectfully moves this Court for an emergency order staying her transfer from the Western District of Oklahoma during the pendency of her Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241.

I. NECESSITY OF THE STAY

1. Petitioner is currently detained by U.S. Immigration and Customs Enforcement (ICE) at the Diamondback Correctional Facility in Watonga, Oklahoma.
2. Petitioner has a pending asylum case and a valid Employment Authorization Document (EAD). She has already complied with state judicial requirements in Denton County, Texas, by paying the required bonds.
3. There is a high risk of imminent transfer by ICE to a remote facility outside of this Court's jurisdiction. Such a transfer would obstruct Petitioner's access to her legal support and her "Next Friend," effectively mooting the pending Habeas Corpus petition and violating her Due Process rights.

II. ARGUMENT

4. A stay is necessary to preserve the Court's jurisdiction over the Petitioner and the Respondents. If Petitioner is moved to another state or district, the fair administration of justice and her ability to challenge her prolonged detention will be irreparably harmed.

5. Petitioner poses no flight risk or danger to the community and has a meritorious asylum claim that requires her presence and access to her evidence.

WHEREFORE, Petitioner respectfully requests that this Court GRANT this emergency motion and ORDER the Respondents to refrain from transferring the Petitioner outside the Western District of Oklahoma until the merits of her Habeas Corpus petition have been adjudicated.

Respectfully submitted,

Scarlett Araujo

Scarlett Araujo Bermudez

Next Friend for Stefany Araujo Bermudez

Date: January 29, 2026