

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

ORLANDO IMBERT-MARRERO,

Petitioner,

v.

WARDEN, ERO El Paso Camp East
Montana, GARRET RIPA, Miami Field
Office Director, TODD LYONS, Director
U.S. Immigration & Customs Enforcement,
and KRISTI NOEM, U.S. Secretary of
Homeland Security,

Respondents.

Case No. 3:26-cv-00349

UNOPPOSED MOTION TO TRANSFER VENUE

Petitioner Orlando Imbert-Marrero, by and through undersigned counsel, respectfully moves this Court to transfer venue in this matter to the U.S. District Court for the Middle District of Florida.

Respondents filed an advisory with this Court that Petitioner was no longer detained within the district and had been relocated to a new detention facility in Florida. ECF No. 6. Petitioner is currently detained in the Florida Soft Side detention facility in Ochopee, Florida. Exhibit 1—Updated Detention Information. Ochopee, Florida is located in Collier County and within the jurisdiction of the Fort Myers Division of the U.S. District Court for the Middle District of Florida.

While Petitioner has no doubt that this Court has jurisdiction over the instant matter

and that venue could be maintained here, he seeks transfer of venue pursuant to 28 U.S.C. § 1404(a) for reasons of convenience and in the interest of justice.

Respectfully submitted,

Date: March 27, 2026

/S/ Amanda Waterhouse
AMANDA WATERHOUSE
Waterhouse Dominguez & Strom, PLLC
PO Box 671067
Houston, Texas 77267
Phone: (713) 930-1430
awaterhouse@wdslawyers.com

Attorney for Petitioner

Certificate of Conference

I certify that I conferred with opposing counsel, Assistant United States Attorney Gerald R. Krimbill, prior to the filing of this motion and he confirmed that Respondents are not opposed.

/s/ Amanda Waterhouse
AMANDA WATERHOUSE
Attorney for Petitioner

Certificate of Service

I certify that the foregoing was duly served on all parties via the CMF/ECF system on March 27, 2026.

/s/ Amanda Waterhouse
AMANDA WATERHOUSE
Attorney for Petitioner