

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

Maria Jesus Lema Lema,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department of
Homeland Security,

Todd M. Lyons, Acting Director of Immigration
and Customs Enforcement,

Marisa Flores, Director, El Paso Field Office
Immigration and Customs Enforcement, and

Curtis Taylor, Major General, U.S. Army at Camp
Bliss,

Respondents.

Case No. 3:26-cv-353

Expedited Handling Requested

PETITIONER MARIA JESUS LEMA LEMA'S
EXPEDITED MOTION TO REOPEN AND MOTION TO SHOW CAUSE

Petitioner Maria Jesus Lema Lema, by and through the undersigned attorneys, seeks emergency relief for Respondents' violation of this Court's February 18 Orders. On February 5, 2026, Petitioner submitted a habeas petition seeking relief from his unlawful detention. ECF No. 1. On February 18, 2026, the Court entered an Order to Show Cause and ordered Respondents to provide Ms. Lema Lema with a bond hearing by no later than February 25, 2026. ECF No. 8. The Order further states "if Lema [Lema] is released from custody, Respondents shall **RETURN** all of her personal property in their custody to her upon release." *Id.* at 6 (emphasis in original).

Respondents have provided Ms. Lema Lema with a bond hearing, and she was released from custody. Dkt. No. 10. However, Respondents have failed to return Ms. Lema Lema's personal property. Counsel for Ms. Lema Lema initially reached out to counsel for Respondents on March 5 but has been unable to obtain Ms. Lema Lema's belongings more than two weeks later. The retained possessions include: a small brown backpack, three cell phones (which are Respondent's family's primary modes of communication), medical cards for Respondent and her four minor children, her ATM and public transit cards, as well as a small wallet containing her wedding ring and a religious figurine.

Not only does the retention of Ms. Lema Lema's personal property violate the Court's Order and her constitutional rights, such retention further hinders her ability to re-enter the community, access her bank accounts, receive medical services, use public transportation, and communicate with her community and the public—including receiving any phone communications related to her immigration status. Moreover, given that Ms. Lema Lema has a legal right to remain in the United States during her pending asylum case, the fact that her belongings remain detained is yet another insult to an already injurious month of detention which never should have happened in the first place.

As a result, Ms. Lema Lema now moves to reopen her case and for the Court to issue an order to show cause why Respondents should not be held in contempt.

Dated: March 20, 2026

McKool Smith, P.C.

/s/ R/ Mitch Verboncoeur

R. Mitch Verboncoeur

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