

I. INCORPORATION BY REFERENCE

Petitioner incorporates by reference the original Petition for Writ of Habeas Corpus, filed February 6, 2026 (Dkt. 1), including all exhibits and attachments, as if fully set forth herein. Petitioner further incorporates by reference the factual allegations and legal arguments set forth in the *Motion to Extend Habeas Amendment Deadline, Expedite Pro Hac Vice Motion, and Ancillary Order Pausing Imminent Asylum Proceedings Pending Habeas Ruling to Avoid Mootness*, submitted on March 2, 2026 through the Court's Electronic Submission for *Pro Se* Filers portal.

II. CLARIFICATION OF NEXT FRIEND STATUS AND COUNSEL ROLE

Petitioner reaffirms that this habeas action is brought by and through *Next Friend*, Furlow, who has consistently visited Petitioner at the civil immigration detention facility and has been expressly authorized in writing by Petitioner to pursue this habeas action on his behalf.

In accordance with the Court's February 24, 2026 Order (Dkt. 6), Furlow has filed a Motion to Appear *Pro Hac Vice* (Dkt. 8). Upon the Court's approval of that motion, Furlow intends to transition from appearing solely as *Next Friend* to serving as *Attorney of Record*.

Because the *Pro Hac Vice* motion remains pending, Furlow is not presently authorized to file documents via CM/ECF as counsel of record. Thus, in good-faith compliance with the Court's March 3, 2026 amendment deadline, this Protective Amended Petition is submitted through the Court's Electronic Submission for *Pro Se* Filers portal.

III. PRESERVATION OF CLAIMS AND REQUEST FOR FURTHER AMENDMENT

Petitioner's claims continue to arise under the Due Process Clause of the Fifth Amendment, challenging constitutionally inadequate bond proceedings and the resulting prolonged civil immigration detention under 8 U.S.C. § 1226(a), as previously detailed in the original Petition and related filings.

Petitioner respectfully requests leave to file a comprehensive amended petition, including full factual development and expanded legal argument, within seven (7) days after the Court rules on Furlow's pending Motion to Appear *Pro Hac Vice* (Dkt. 8). This request is consistent with the relief sought in Petitioner's March 2, 2026 motion to extend the habeas amendment deadline.

IV. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully prays that the Court:

- a. Accept and docket this Protective Amended Petition as timely compliance with the Court's February 24, 2026 Order (Dkt. 6);
- b. Grant Petitioner, through Furlow, leave to file a detailed amended petition within seven (7) days after the Court rules on the pending Motion to Appear *Pro Hac Vice* (Dkt. 8); and
- c. Grant such other and further relief as the Court deems just and proper.

Dated: March 3, 2026

Respectfully submitted,

/s/ William James Furlow
WILLIAM JAMES FURLOW
Next Friend and *Pro Hac Vice* applicant
DC Bar No. 90035080
(Not yet admitted in the Western District of Texas;
filing via Electronic Submission for *Pro Se* Filers portal)

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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2026, a true and correct copy of the foregoing Protective Amended Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 was served upon all parties/respondents as follows:

This filing was submitted electronically via the Court's Electronic Submission for *Pro Se* Filers portal. Because the filer is not yet a registered Filing User (*Pro Hac Vice* admission pending), no Notice of Electronic Filing (NEF) was generated by the CM/ECF system to constitute automatic service. Upon grant of the pending Motion to Appear *Pro Hac Vice* (Dkt. 8), future filings and service will proceed via full CM/ECF, with the NEF constituting service on registered Filing Users.

Service on Respondents' counsel of record was accomplished electronically by email, in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and customary practice in this District for represented parties:

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I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Dated: March 3, 2026

/s/ William J. Furlow
William James Furlow
Pro Hac Vice Counsel Applicant (pending application)
and *Next Friend* for Petitioner
DC Bar No. 90035080

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