

FILED
U.S. DISTRICT COURT
DISTRICT OF COLORADO


2026 FEB -9 PM 2: 28

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

JUDITH P. COLWELL
CLERK
BY _____ DEP. CLK

26 - C V - 0 4 9 9

Civil Action No.: _____

LUIS MIGUEL RANGEL SOLANO,

Petitioner,

v.

MERRICK B. GARLAND, Attorney General of the United States;

U.S. DEPARTMENT OF HOMELAND SECURITY
(DHS).

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE);

DIRECTOR, AURORA ICE PROCESSING CENTER,
Respondent.

MOTION TO STAY TRANSFER

Petitioner, **LUIS MIGUEL RANGEL SOLANO**, by and through his Next Friend, **Maritza Elizabeth Martines Lopez**, respectfully requests that this Court issue an order preventing his transfer outside the District of Colorado while this Petition for Writ of Habeas Corpus is pending.

Petitioner is currently detained at the **AURORA ICE PROCESSING CENTER IN AURORA, COLORADO**, which is within the jurisdiction of this Court. This Court has authority over this matter because Petitioner is physically detained in this district.

A transfer to another detention facility, particularly outside the State of Colorado, would significantly interfere with Petitioner's ability to pursue this habeas action. Such a transfer could disrupt this Court's jurisdiction, delay proceedings, limit Petitioner's access to legal resources, and

severely impair communication with his Next Friend and other support persons assisting him with this case.

Petitioner has **NO CRIMINAL RECORD, IS NOT SUBJECT TO A FINAL ORDER OF REMOVAL**, and is actively seeking judicial review of the legality of his continued detention through this habeas proceeding. If transferred, Petitioner would suffer irreparable harm, including diminished access to the courts, difficulty communicating with those assisting him, and potential interference with meaningful judicial review.

Courts have recognized that maintaining a detainee within the jurisdiction while a habeas petition is pending is necessary to preserve the Court's authority and to protect the petitioner's due process rights.

For these reasons, Petitioner respectfully requests that this Court order Respondents **NOT TO TRANSFER HIM OUTSIDE THE DISTRICT OF COLORADO** while this matter remains pending before the Court.

Respectfully submitted,




MARITZA ELIZABETH MARTINES LOPEZ
Next Friend of the Petitioner



Date: February 6, 2026

PROOF OF SERVICE

I, **MARITZA ELIZABETH MARTINES LOPEZ**, declared under perjury that on the date indicated below, I served a true and correct copy of the following documents:

“Application for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, Declaration of Next Friend, and all supporting documents “on behalf of Jefferson Johan Jaimes Vargas,  by mailing said documents to the following parties:

1. Clerk of Court
United States District Court for the District of Colorado
Alfred A. Arraj Courthouse
901 19th Street
Denver, CO 80294

2. United States Attorney’s Office
for the District of Colorado
1801 California Street, Suite 1600
Denver, CO 80202

3. Director
Aurora ICE Processing Center
3130 N Oakland Street
Aurora, CO 80010

4. Department of Homeland Security
ICE Office of Chief Counsel
12445 East Caley Avenue
Centennial, CO 80111

I declare that the foregoing is true and correct; Executed on the 6th day of February 2026



MARITZA ELIZABETH MARTINES LOPEZ
Next Friend of the Petitioner

