

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

**FILED
U.S. DISTRICT COURT
DISTRICT OF COLORADO
26 MAR 10 PM 2:27**

Luis Miguel Rangel Solano,
Petitioner,

v.

DIRECTOR AURORA ICE PROCESING CENTER,
Respondent.

Civil Action No: 26-cv-00499-RTG

APPLICATION FOR A WRIT OF MOTION TO EXPEDITE CONSIDERATION

Petitioner, **Luis Miguel Rangel Solano** (A# ~~XXXXXXXXXX~~), respectfully moves this Court for expedited consideration of his Petition for Writ of Habeas Corpus and his Motion for Immediate Release.

This Motion is based upon the Court's inherent authority to control its docket, the extraordinary liberty interests at stake, and the ongoing constitutional violation resulting from Petitioner's continued detention.

I. INTRODUCTION

Petitioners remain in civil immigration detention without having received an individualized bond hearing.

He challenges the constitutionality of his continued detention under the Fifth Amendment.

Every additional day of confinement constitutes a continuing deprivation of physical liberty — the most fundamental interest protected by the Constitution.

Because this case concerns ongoing detention, delay itself perpetuates the alleged constitutional violation.

II. LEGAL STANDARD

Federal courts possess broad discretion to expedite proceedings where:

1. Fundamental liberty interests are implicated.

2. Delays would cause irreparable harm.
3. The issues presented are primarily legal in nature; and
4. The interests of justice favor prompt resolution.

In habeas proceedings, expedition is particularly appropriate because the writ exists to test the legality of present confinement.

Where an individual alleges unconstitutional detention, time is not neutral — time compounds the injury.

III. ARGUMENT

A. Petitioner Remains Detained Without Constitutional Process

Petitioners are currently confined in immigration custody despite:

- Having no criminal history;
- Not being subject to a final order of removal.
- Never receiving an individualized bond hearing.
- Having stable housing and a sponsor available.

His detention continues without a neutral adjudicator having determined whether he poses a danger or a flight risk.

Because his confinement allegedly violates the Fifth Amendment, each day of continued detention prolongs the constitutional injury.

B. Liberty Interests Warrant Immediate Judicial Attention

Physical liberty occupies a unique constitutional status.

Unlike monetary harm or administrative inconvenience, wrongful detention:

- Cannot be retroactively remedied;
- cannot be compensated fully after the fact.
- Directly implicates core due process protection.

Habeas corpus is designed to provide swift judicial review of executive detention. Delay undermines the purpose of the writ itself.

C. Irreparable Harm Is Ongoing

Petitioners suffer irreparable harm daily because:

- He is deprived of freedom of movement.
- He is separated from his support network.
- His ability to assist in his legal proceedings is impaired.
- He endures emotional and psychological strain inherent in detention.

If the Court ultimately determines that his detention is unconstitutional, the time lost cannot be restored.

Irreparable injury is therefore ongoing and immediate.

D. Expedited Consideration Will Not Prejudice the Government

This case presents primarily legal questions concerning the constitutionality of detention without an individualized bond hearing.

The relevant facts are straightforward and undisputed.

An expedited schedule:

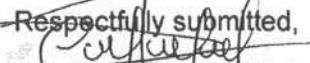
- Would not prejudice Respondent;
- Would serve judicial efficiency;
- Would protect constitutional values.

The balance of equities favors prompt resolution.

IV. REQUEST FOR RELIEF

For the foregoing reasons, Petitioner respectfully requests that this Court:

1. Set an expedited briefing schedule;
2. Order Respondent to file a response within a shortened time frame.
3. Issue a prompt ruling on the Petition for Writ of Habeas Corpus and Motion for Immediate Release.
4. Grant any additional relief the Court deems just and proper.

Respectfully submitted,

Luis Miguel Rangel Solano

