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MOTION TO EXPEDITE  
(ULTRA - FEDERAL JUDGE LEVEL)  
(28 U.S.C. § 2241)

6:26-cv-00049

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
SAN ANGELO DIVISION

ÁNGEL DANIEL MORAN QUIROGA,  
Petitioner,  
v.  
U.S. DEPARTMENT OF HOMELAND SECURITY, et al.,  
Respondents.

COMES NOW Petitioner, Ángel Daniel Moran Quiroga, by and through his Next Friend, Norberto E. Martínez Romero, and respectfully moves this Honorable Court to EXPEDITE consideration of the pending Petition for Writ of Habeas Corpus and related motions, pursuant to 28 U.S.C. § 2241, the Court's inherent authority, and principles of due process.

#### I. INTRODUCTION

Petitioner is currently subjected to unlawful and dangerous civil immigration detention. Given the severe constitutional violations, medical risks, and irreparable harm alleged, expedited judicial review is necessary.

#### II. LEGAL STANDARD

Federal courts possess inherent authority to manage their dockets and to expedite proceedings where justice so requires. See *Landis v. North American Co.*, 299 U.S. 248 (1936). Habeas petitions require prompt resolution. See *Preiser v. Rodriguez*, 411 U.S. 475 (1973).

#### III. GOOD CAUSE FOR EXPEDITED REVIEW

##### A. Ongoing Constitutional Violations

Petitioner continues to suffer punitive conditions of confinement in violation of the Fifth Amendment.

##### B. Serious Medical Risk

Petitioner suffers from chronic asthma and severe allergies, and denial of medical care poses an imminent threat to his health.

C. Risk of Irreparable Harm

Petitioner faces ongoing abuse, retaliation, and the risk of transfer or removal without notice.

D. No Prejudice to Respondents

Expedited review will not prejudice Respondents, who maintain full access to Petitioner and relevant records.

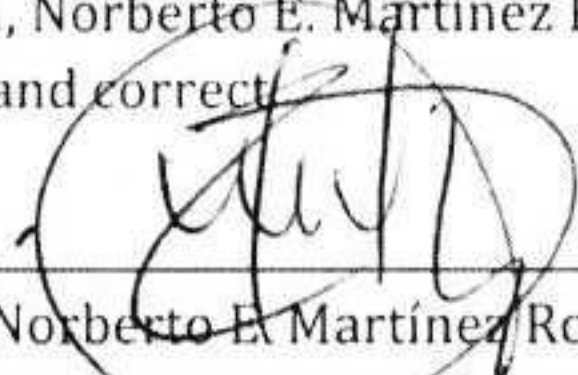
IV. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Expedite consideration of the Petition for Writ of Habeas Corpus;
2. Expedite ruling on the Motion for Immediate Release;
3. Grant any other relief deemed just and proper.

V. VERIFICATION

I, Norberto E. Martínez Romero, declare under penalty of perjury that the foregoing is true and correct.



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Norberto E. Martínez Romero

Next Friend for Petitioner

Date: 2-2-2026