

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MILDRED ABECK MUSONG

Petitioner,

v.

VERNON LIGGINS, Acting Director of the U.S. Immigration and Customs Enforcement Baltimore Field Office; MATTHEW ELLISTON, Deputy Assistant Director for Field Operations, Eastern Division, Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement; KRISTI NOEM, Secretary of the U.S. Department of Homeland Security; and PAMELA BONDI, Attorney General of the United States, in their official capacities,

Respondents.

Case No: 1:26-cv-586-TDC

MOTION FOR IMMEDIATE RELEASE

This is a motion requesting that the Court issue an order compelling Respondents to immediately release Petitioner, Mrs. Mildred Abeck Musong (“Mrs. Musong”) pending her bond hearing with the Hyattsville Immigration Court. Alternatively, Petitioner requests that the Court modify its order granting Petitioner’s habeas in part, *Musong v. Liggins*, 1:26-cv-00586-TDC (D. Md. Feb. 19, 2026) (ECF No. 9), to include immediate release, given the inhumane conditions in the Baltimore Hold Room.

At the time of filing this motion, Mrs. Musong is detained at the Baltimore Hold Room located at 31 Hopkins Plaza, 6th Floor Baltimore, MD 21201. Exhibit 1, Printout of ICE Detainee Locator. Mrs. Musong has been detained by Respondents since February 11, 2026. See Petition

for Writ of Habeas Corpus, ECF No. 1, ¶¶ 37-38. On or about Saturday February 14, 2026, Petitioner was transferred from the Baltimore Hold Room to the Karnes County Immigration Processing Center in Texas. Petitioner was held there for approximately 24 hours and then returned to the Baltimore Hold Room.

This Court granted Petitioner's habeas corpus petition in part on February 19, 2026. *See* ECF No. 9. The Court ordered that a bond hearing be held by an Immigration Judge with jurisdiction or administrative control over the Petitioner's detention and that a bond hearing be held within 14 days of the Petitioner's filing of a motion with the Immigration Court. *Id.* Petitioner's counsel was in contact with Respondent's counsel and a Senior Attorney for OPLA Baltimore regarding the scheduling of a bond hearing that same day. The OPLA attorney advised undersigned counsel that they will see if the immigration court can squeeze Petitioner into the docket scheduled for February 20, 2026.

Mrs. Musong appreciates this Court's prompt consideration and partial grant of her habeas petition. At the time the Court granted Petitioner's habeas corpus petition, her counsel was waiting to see her at the Baltimore Hold Room. At this time, Petitioner respectfully requests that this Court consider ordering her release from the Baltimore Hold Room pending her bond hearing.

Mrs. Musong was visibly struggling to keep her eyes open while talking to undersigned counsel. When asked how she was feeling she expressed that she was not well and she was not being provided with her blood pressure medication. Mrs. Musong expressed that she is very sleepy, and has had a headache for several days. She stated that she has only been drinking water and has been unable to eat any of the food available at the Baltimore Hold Room because it all has lots of sugar and her doctor has told her to avoid eating food with high sugar content because of her blood pressure. She also confirmed that she has been sleeping on the floor.

Countless news reports, eyewitness accounts, and Congressional oversight of the Baltimore ICE ERO facility firmly establish that the detainee conditions and treatment are exceptionally inadequate and harmful to detainee wellbeing. In June 2025, Immigration and Customs Enforcement (“ICE”) leadership directed Enforcement and Removal Operations (“ERO”) field offices to waive the typical 12 hour hold room standard, to allow ERO facilities to house detainees “for up to, but not exceeding, 72 hours, absent exceptional circumstances.”¹ The increase in immigration enforcement activities in the last year, coupled with the fact that Maryland does not maintain any ICE facilities in the state, means that many newly detained individuals are kept in the Baltimore Hold Room after DHS immigration enforcement actions within the state.²

Over the last year, congressional leaders, state officials, and legal advocacy groups have decried the inhumane conditions the Baltimore Hold Room. Maryland Attorney General Anthony Brown stated in a legal filing that the conditions there are so poor “that they would violate standards if it were a state run facility.”³ Numerous noncitizen petitioners filed a class action suit in Maryland in May 2025 to prevent long term detention of individuals in the Baltimore Hold Room, alleging punitive and inhumane conditions. See First Amended Class Action Complaint for Declaratory Relief, Complaint for Injunctive Relief, and Petition for a Writ of Habeas Corpus, *D.N.N and V.R.G. v. Baker, et al.*, No. 1:25-cv-01500-JRR (D. Md. May 6, 2025).

Last month, a video circulated online of conditions inside the Baltimore Hold Room, showing dozens of people packed inside an ICE holding room at 31 Hopkins Plaza. A Maryland congressional representative visited the facility on January 30, 2026, and reported that “detainees

¹ *Policy Memorandum*, Immigr. and Customs Enforcement (June 24, 2025) (attached hereto as **Exhibit 3**).

² See Williams IV, John-John, et al., *Viral video offers rare look inside Baltimore’s crowded ICE holding room*, The Baltimore Banner (Jan. 27, 2026) available at thebanner.com/politics-power/national-politics/viral-video-baltimore-ice-holding-room-immigrants-DWH3RIXO45CDRGZDZA4QPA3JNQ (attached hereto as **Exhibit 4**)

³ Zawodny, Daniel, *Maryland AG urges end to lengthy stays in Baltimore ICE holding room*, The Baltimore Banner (June 18, 2025) available at banner.com/politics-power/ice-maryland-immigration-anthony-brown-F4SYTZPOEZCKROKB3465U52FLY (attached hereto as **Exhibit 5**)

sleep on thin mats with foil blankets placed directly on concrete floors, and she reported that some of those being detained in the facility told her they were hungry and thirsty.”⁴ Congresswoman “McClain Delaney described one room ‘with probably 50 people, concrete floors, a bench around the perimeter, and a makeshift bathroom in the middle that has minimal privacy.’”⁵

Recently detained individuals report that ICE has withheld medications, did not provide soap, toothbrushes or toothpaste, and limited access to hygiene products.⁶ Members of the Maryland Congressional delegation wrote to Respondent Todd Lyons on January 20, 2026, confirming that their “constituents have reported that detainees have routinely been denied access to medical care and medications, basic hygiene products, and timely communication with their families and legal counsel.”⁷

These news reports, legal filings, and state and congressional investigations provide a glimpse of the conditions Mrs. Musong has been subjected to at the Baltimore Hold Room. Mrs. Musong has a fixed address in Temple Hills, Maryland and anticipates appearing for a bond hearing before the Hyattsville Immigration Court in the coming days. This Court has already determined that Mrs. Musong is not subject to mandatory detention. *See* Order, ECF No. 9. Ordering Mrs. Musong’s immediate release will protect her from enduring further unsanitary, inhumane, and punitive conditions in this ill-equipped holding facility which she has already endured for six days. Jurists in a sister district, Eastern District of Virginia, have ordered

⁴ Hellgren, Mike & Moodee Lockman, JT, *Conditions inside Baltimore ICE Facility*, CBS News (January 30, 2026), available at [cbsnews.com/baltimore/news/ice-facility-conditions-immigration-enforcement](https://www.cbsnews.com/baltimore/news/ice-facility-conditions-immigration-enforcement) (attached hereto as **Exhibit 6**)

⁵ *Id.*

⁶ *See* Williams IV, John-John, et al., *Viral video offers rare look inside Baltimore’s crowded ICE holding room*, The Baltimore Banner (Jan. 27, 2026) available at [thebanner.com/politics-power/national-politics/viral-video-baltimore-ice-holding-room-immigrants-DWH3RIXO45CDRGZDZA4QPA3JNQ](https://www.thebanner.com/politics-power/national-politics/viral-video-baltimore-ice-holding-room-immigrants-DWH3RIXO45CDRGZDZA4QPA3JNQ) (attached hereto as **Exhibit 4**)

⁷ *Maryland Delegation Letter*, U.S. Cong. (Jan. 20, 2026) (attached hereto as **Exhibit 7**).

Petitioners' immediate release upon habeas grants pending their bond hearings. *See* Order, *Maya Torres v. Crawford*, 1:25-cv-01891-LMB-LRV (E.D. Va. Nov. 6, 2025) (Brinkema, J.); Order, *Aguilar Cotuc v. Crawford*, 1:25-cv-01994-PTG-LRV (E.D. Va. Nov. 25, 2025) (Tolliver Giles, J.); Order, *Majano Fuentes v. Bondi*, 1:25-cv-01909-PTG-LRV (E.D. Va. Dec. 5, 2025) (Tolliver Giles, J.).

Another reason for immediate release in this case is that DHS expressly stated to Petitioner's counsel that Petitioner will be transferred to a detention facility in another state on Friday, February 20, 2026. This transfer would lead to delays in the bond hearing proceeding, and Petitioner will be burdened with the costs of having to travel back to her home in Maryland. The ICE officer that spoke with undersigned counsel was unable to confirm where Petitioner would be transferred. Undersigned counsel spoke with a second official, explicitly noting the partial habeas corpus order issued by this Court, and requested that Petitioner be removed from the flight manifest to allow her to appear at a bond hearing tomorrow, Friday February 20, 2026. This second official stated that she was scheduled to be on a flight at 8:30am on Friday, February 20, 2026, and that once someone has been added to a manifest, they cannot come off. Without this Court's swift intervention, Mrs. Musong will be subjected to unnecessary additional time in immigration detention and have to manage her own way home to Maryland, while feeling unwell as a direct result of the conditions of her detention.

Petitioner is appreciative that the Court moved swiftly to remedy her unlawful detention, and moves the Court to consider her emergency request for immediate release from the Baltimore Hold Room, to protect against the well documented inhumane conditions, and to enable her full participation in her bond hearing.

Respectfully submitted,

/s/ Alexis Turner-Lafving

Alexis Turner-Lafving

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Dated: February 19, 2026

Exhibit List

1. Printout of ICE Detainee Locator
2. DOJ EOIR eROP acknowledgement of the filing of a bond motion
3. *Policy Memorandum*, Immigr. and Customs Enforcement (June 24, 2025)
4. Williams IV, John-John, et al., *Viral video offers rare look inside Baltimore's crowded ICE holding room*, The Baltimore Banner (January 27, 2026) available at thebanner.com/politics-power/national-politics/viral-video-baltimore-ice-holding-room-immigrants-DWH3RIXO45CDRGZDZA4QPA3JNQ
5. Zawodny, Daniel, *Maryland AG urges end to lengthy stays in Baltimore ICE holding room*, The Baltimore Banner (June 18, 2025) available at banner.com/politics-power/ice-maryland-immigration-anthony-brown-F4SYTZPOEZCKROKB3465U52FLY
6. Hellgren, Mike & Moodee Lockman, JT, *Conditions inside Baltimore ICE Facility*, CBS News (Jan. 30, 2026), available at cbsnews.com/baltimore/news/ice-facility-conditions-immigration-enforcement
7. *Maryland Delegation Letter*, U.S. Cong. (Jan. 20, 2026)

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on February 19, 2026, I uploaded the foregoing Emergency Motion for Immediate Release along with all attachments thereto, to this Court's CM/ECF system, which Respondents participate in and will receive copies of all filings.

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