IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

PORTILLO-MALDONADO, *et al.*,	)	
	)	
Petitioners,	)	
	)	
v.	)	Case No. 1:26-cv-00488 (AJT/WEF)
	)	
KRISTI NOEM, *et al.*,	)	
	)	
Respondents.	)	
	)	

CONSENT MOTION FOR PARTIAL MODIFICATION OF INITIAL NO TRANSFER ORDER AS TO PETITIONER ISAI BLADIMIR PEREZ-HUANON

Petitioner Isai Bladimir Perez-Huanon, by counsel, respectfully moves this Court for partial modification of its initial no-transfer order, ECF No. 3, with respect to only Mr. Isai Perez-Huanon. Good cause exists because:

1. Petitioner Isai Perez-Huanon filed his petition for a writ of habeas corpus on February 18, 2026. ECF No. 1. On February 19, 2026, this Court entered an order to show cause, requiring Respondents to file a response to the petition by a particular date. ECF No. 3. That order to show cause also provided:

> ...that the Respondents and any of Respondents officers, agents, servants, employees, and attorneys, as well as other person acting in concert with them be, and the same hereby are, ENJOINED from removing the Petitioners from this judicial district pending further order of the Court.

Id.

2. Based on previous orders that this Court has entered in the same context, it appears that this language was intended only to ensure the continuation of its jurisdiction over the habeas petition during the pendency of this action. *Cf. Rumsfeld v. Padilla*, 542 U.S. 426, 442 (holding

that petitions seeking a writ of habeas corpus must be originally brought in the district in which the petitioner is being confined).

3. On March 24, 2026, Mr. Perez-Huanon was granted voluntary departure under section 240B(a) of the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1229c(a). Mr. Perez-Huanon also waived any appeal of that order to the Board of Immigration Appeals, rendering the decision administratively final. 8 U.S.C. § 1101(a)(47)(B).

4. To the extent that the language in the February 19, 2026, order to show cause could be interpreted as preventing Mr. Perez-Huanon's voluntary departure, undersigned counsel requests that the order be modified to allow for the effectuation of his voluntary departure.

5. On April 6, 2026, Respondents' consented to this motion by email.

6. A proposed order has been attached for the convenience of this Court.

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Dated: April 26, 2026

Respectfully submitted,

/S/ Alex Kornya
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