

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Carlos VILLARREAL,

Petitioner,

v.

**(1) Warden of South Texas Detention
Center, in their official capacity**

**(2) MIGUEL VERGARA, Field Office
Director of the San Antonio Field Office, U.S.
Immigration and Customs Enforcement,
Enforcement and Removal Operations;**

**(3) TODD LYONS, Senior Official Performing,
the Duties of the Director, U.S. Immigration
and Customs Enforcement;**

**(4) KRISTI NOEM, Secretary of the U.S.
Department of Homeland Security;**

**(5) PAMELA BONDI, U.S. Attorney General,
in their official capacities,**

Respondents.

Case No. 5:26-cv-01147-JKP

**MOTION FOR BRIEF STAY TO ALLOW COUNSEL TO ADVISE
PETITIONER REGARDING WITHDRAWAL OF HABEAS PETITION**

Undersigned counsel respectfully requests a brief stay of decision to allow time to advise petitioner of the consequences of withdrawing his habeas petition. In support of this request, counsel states:

1. Petitioner was hospitalized last week for unknown reasons. See **EXHIBIT 1**, transfer notice for petitioner to university hospital.

2. Because of this hospitalization, undersigned counsel was not able to meet with Petitioner before he submitted the advisory to the court marked Document 11.

3. Undersigned counsel has scheduled a confidential video call with petitioner for Friday, March 27, 2026. See **EXHIBIT 2**, copy of virtual attorney visit appointment for petitioner and undersigned counsel. At this appointment, counsel will have the opportunity to advise him of the consequences of withdrawal and subsequently formalize his request should he wish to proceed with the withdrawal after receiving counsel.

For all of these reasons, counsel respectfully requests a stay of ten (10) days in this matter.

Respectfully submitted this 20 day of March, 2026.

s/Jennifer Walker Gates
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Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2026, a true and correct copy of the foregoing Petition for Writ of Habeas Corpus was provided to the following Respondents via e-filing:

Warden
South Texas Detention Center
566 Veterans Drive
Pearsall, TX 78061

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