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**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

AMY TOOKE, as Next Friend of

RENZO ZUNIGA MACCHIAVELLO (A# )

Petitioner,

v.

KRISTI NOEM, Secretary, U.S. Department of Homeland Security;

TODD M. LYONS, Senior Official Performing the Duties of the Director, U.S.
Immigration and Customs Enforcement;

WARDEN, IRWIN COUNTY DETENTION CENTER;

Respondents.

Civil Action No.: _____

EMERGENCY MOTION TO EXPEDITE CONSIDERATION

COMES NOW Petitioner Amy Tooke, as Next Friend of Renzo Zuniga Macchiavello, and respectfully moves this Honorable Court to expedite consideration of the pending Petition for Writ of Habeas Corpus (28 U.S.C. § 2241) and related motions, including the Emergency Motion for Immediate Release.

I. BASIS FOR EXPEDITED REVIEW

1. Ongoing Deprivation of Liberty: Mr. Zuniga has been detained since January 22, 2025. Each additional day of detention constitutes a continuing deprivation of liberty protected by the Fifth Amendment.

2. Risk of Irreparable Harm: Mr. Zuniga has experienced significant weight loss, deterioration of mental health, and denial or delay of medical care. Continued detention presents escalating and irreparable harm.

3. Risk of Sudden Transfer or Removal: There is a credible fear that Respondents may transfer or remove Mr. Zuniga—including potential third-country removal—without adequate notice. Such action could irreparably harm Petitioner and moot this Court's jurisdiction.

4. Substantial Likelihood of Success on the Merits: The underlying habeas petition raises serious constitutional concerns regarding prolonged civil detention, excessive force, and unconstitutional conditions of confinement.

5. Public Interest: The public has a strong interest in ensuring constitutional compliance and preventing unlawful executive detention.

II. LEGAL AUTHORITY

This Court has inherent authority to control its docket and may expedite proceedings where justice so requires. See Fed. R. Civ. P. 1 (mandating the just, speedy, and inexpensive determination of actions). Habeas proceedings, by their nature, warrant prompt judicial review where liberty interests are at stake.

III. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

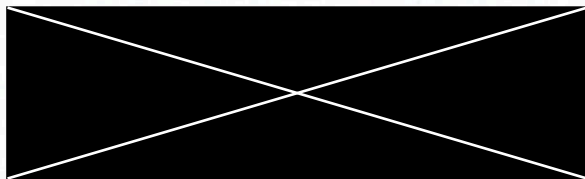
- A. Issue an Order expediting briefing and consideration of the pending Petition for Writ of Habeas Corpus;
- B. Set a shortened response deadline for Respondents;
- C. Schedule prompt judicial review and hearing, if necessary;
- D. Grant any other relief the Court deems just and proper.

Respectfully submitted,



AMY TOOKE

Next Friend for Renzo Zuniga Machiavello



Date: Feb. 24, 2026