

EMERGENCY MOTION FOR EXPEDITED REVIEW AND IMMEDIATE RELEASE

Petitioner, through Next Friend, respectfully moves this Court for expedited review and immediate relief.

Petitioner remains detained despite suffering from documented serious orthopedic conditions, including multiple hip replacement surgeries and a revision procedure requiring continued medical monitoring and mobility accommodations.

While detained, Petitioner has been transferred between facilities in multiple states. These repeated transfers disrupt continuity of care and increase the risk of serious medical complications, including infection, thrombotic events, prosthetic instability, and permanent mobility impairment.

Petitioner continues to experience pain and functional limitations while in custody. Continued detention under these conditions places him at ongoing risk of further physical deterioration.

The balance of equities favors immediate intervention. Supervised release would pose minimal administrative burden, while continued detention exposes Petitioner to ongoing medical harm.

Because the risk to Petitioner's health continues each day he remains detained, expedited judicial review is necessary to prevent further injury while the underlying petition is pending.

Petitioner respectfully requests that this Court:

Expedite consideration of the Petition for Writ of Habeas Corpus; and

Order immediate supervised release, or alternatively, prompt custody review.

Respectfully submitted,

Print Name: Rouslyn Cortina Mandiarote

Next Friend of Alberto Garcia Ceballos

Date: 02/03/2026

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FILED - USDC - FLMD - FTM

MEMORANDUM OF LAW IN SUPPORT

Petitioner, a Cuban national, has been detained since October 30, 2025, pursuant to a final order of removal dated April 14, 2016. Despite months of detention and multiple interstate transfers, removal has not been carried out. Petitioner suffers from serious medical conditions, including two total hip replacements and a revision surgery requiring ongoing orthopedic care and physical therapy. Continued detention raises significant constitutional concerns. Petitioner has been transferred between facilities in Florida, Montana, and Louisiana before returning to Florida. He is currently detained at Florida Soft Side South Detention Center in Ochopee, Florida. Medical documentation confirms the need for ongoing orthopedic monitoring, pain management, physical therapy, and mobility accommodations. Repeated transfers interrupt continuity of care and increase risk of medical complications including prosthetic dislocation, thrombosis, infection, and long-term mobility impairment. Removal has not been effectuated, and no confirmed removal date has been provided. Continued detention without a clear timeline, combined with serious medical vulnerability, warrants judicial review and relief.

Respectfully submitted,

Print Name: Rouslyn Cortina Mandiarote

Next Friend of Alberto Garcia Ceballos



Date: 02/03/2026

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