

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JHON LESTER GARCIA BARRIENTOS,

Petitioner,

v.

NIKITA BAKER, et al.

Respondents.

Case No. 1:26-cv-984

PETITIONER'S EMERGENCY MOTION TO EXTEND STAY OF REMOVAL

Petitioner Jhon Lester Garcia Barrientos respectfully requests that this Court extend his stay of removal. In support of this motion, Petitioner states as follows:

1. On March 6, 2026, Petitioner filed a Petition for a Writ of Habeas Corpus ("the Petition") with this Court. ECF No. 1. Petitioner filed an Amended Petition on March 13, 2026. ECF No. 15. On March 9, 2026, Petitioner filed a Motion for Temporary Restraining Order and Preliminary Injunction, ECF No. 8, which was granted in part on March 12, 2026, extending Petitioner's stay of removal until March 26, 2026. ECF No. 14.
2. On March 19, 2026, the Court extended the Temporary Restraining Order to April 9, 2026, three days from today. ECF No. 27.
3. On April 2, 2026, the Court held a hearing on the Petition.
4. Petitioner respectfully requests that the Court grant this Emergency Motion to Extend his Stay of Removal until the Court issues a decision on the Petition and, if the Petition is denied, until due process is satisfied.

5. The grounds for this motion are set forth in the Motion for Emergency Temporary Restraining Order and Preliminary Injunction, the accompanying memorandum of law, exhibits in support thereof, the Petition for Writ of Habeas Corpus, the Amended Petition for a Writ of Habeas Corpus, and the applicable law. A proposed order also accompanies this motion.

Respectfully submitted,

/s/ Julia Rigal

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Pro Bono Counsel for Petitioner

Dated: April 6, 2026

CERTIFICATE OF SERVICE

I certify that on this 6th day of April 2026 the foregoing Petitioner's Emergency Motion to Extend Stay of Removal was e-filed using the Court's CM/ECF system and thereby served on counsel of record.

/s/ Julia Rigal
Julia Rae Liliane Rigal
Counsel for Petitioner