

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION

FILED
U.S. DISTRICT COURT
WAYCROSS, GA

2025 MAR 11 AM 11:04

mm

EMERGENCY MOTION FOR STAY OF REMOVAL
(ANTI-REMOVAL / ANTI-TRANSFER / ANTI-THIRD COUNTRY)
IN AID OF HABEAS CORPUS JURISDICTION
28 U.S.C. § 2241

PETITIONER:

Francisco Antonio Molina Lovo

A-Number: A 

Date of Birth: 

Nationality: Nicaraguan

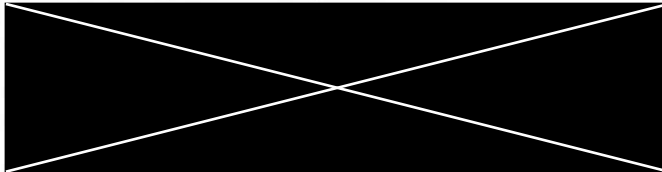
Current Detention Facility: Folkston Main Detention Facility



Folkston, GA 31537

NEXT FRIEND:

Mayerli Laguna Lovo



I. INTRODUCTION

Petitioner, through his Next Friend, respectfully moves this Honorable Court for an emergency Stay of Removal enjoining Respondents from removing, deporting, transferring, or otherwise relocating Petitioner, including to any third country, pending full adjudication of his Petition for Writ of Habeas Corpus and related motions. This relief is necessary to preserve this Court's jurisdiction and prevent irreparable harm.

II. LEGAL AUTHORITY FOR STAY OF REMOVAL

Federal courts possess authority to stay removal where necessary to preserve jurisdiction and protect constitutional rights. See *Nken v. Holder*, 556 U.S. 418 (2009). A stay is

appropriate where the movant shows likelihood of success, irreparable harm, balance of equities in his favor, and service of the public interest.

III. LIKELIHOOD OF SUCCESS ON THE MERITS

Petitioner has demonstrated a substantial likelihood of success on his habeas claims. His continued detention is prolonged, punitive, and marked by deliberate indifference to serious medical needs, in violation of the Fifth Amendment's Due Process Clause.

IV. IRREPARABLE HARM ABSENT A STAY

Absent a stay, Petitioner faces immediate and irreversible harm, including summary removal or transfer that would moot his habeas petition, interrupt life-saving medical care, and expose him to severe danger. Such harm cannot be remedied after removal.

V. BALANCE OF EQUITIES

The balance of equities strongly favors Petitioner. Maintaining the status quo imposes minimal burden on Respondents while protecting fundamental rights, health, and access to judicial review.

VI. PUBLIC INTEREST

The public interest is served by ensuring constitutional compliance, preventing unlawful removals, and preserving the integrity of the judicial process. A stay of removal advances these interests.

VII. SCOPE OF THE STAY REQUESTED

Petitioner respectfully requests that the Stay of Removal include:

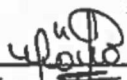
- Prohibition of removal to any country;
- Prohibition of transfer between detention facilities;
- Prohibition of third-country removal;
- Maintenance of Petitioner at his current location pending further order of this Court.

VIII. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Court issue an immediate Stay of Removal and grant any other relief deemed just and proper.

IX. DECLARATION AND SIGNATURE

I declare under penalty of perjury that the foregoing is true and correct.



Mayerli Laguna Lovo

Next Friend for Francisco Antonio Molina Lovo

Date: 02/27/2026