

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION

2025 MAR 11 AM 11:04

mm

EMERGENCY MOTION TO EXPEDITE
ADJUDICATION OF PETITION FOR WRIT OF HABEAS CORPUS
AND RELATED EMERGENCY MOTIONS
(28 U.S.C. § 2241)

PETITIONER:

Francisco Antonio Molina Lovo

A-Number: A [REDACTED]

Date of Birth: [REDACTED]

Nationality: Nicaraguan

Current Detention Facility: Folkston Main Detention Facility

[REDACTED]
Folkston, GA 31537

NEXT FRIEND:

Mayerli Laguna Lovo

Date of Birth: [REDACTED]

Address: [REDACTED]

Phone: [REDACTED]

Email: Mayelovo86@gmail.com

I. INTRODUCTION

Petitioner, through his Next Friend, respectfully moves this Honorable Court to expedite review and adjudication of his Petition for Writ of Habeas Corpus and all related emergency motions. Extraordinary circumstances, including severe medical neglect, unconstitutional conditions of confinement, and risk of irreparable harm, compel immediate judicial action.

II. LEGAL AUTHORITY TO EXPEDITE

Federal courts possess inherent authority to manage their dockets and expedite proceedings where justice so requires. See *Landis v. North American Co.*, 299 U.S. 248

(1936). Courts routinely expedite habeas matters where liberty and life are at stake. See *McClellan v. Young*, 421 F.2d 690 (6th Cir. 1970).

III. GROUNDS FOR EXPEDITED CONSIDERATION

Petitioner suffers from neurocysticercosis, a serious parasitic brain infection requiring immediate and continuous medical supervision. Continued delay places Petitioner at imminent risk of irreversible neurological damage or death.

Petitioner has been subjected to extreme deprivation of food, water, and hygiene, as well as psychological abuse, resulting in severe anxiety, depression, and significant weight loss. Each day of delay compounds the harm.

Additionally, Petitioner faces a credible risk of removal or transfer, including potential third-country deportation, which would irreparably harm his pending asylum claim and deprive this Court of jurisdiction.

IV. BALANCE OF EQUITIES AND PUBLIC INTEREST

The balance of equities strongly favors expedited review. Protecting constitutional rights, preserving life, and preventing irreparable harm serve the public interest. The Government suffers no prejudice from prompt adjudication.

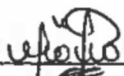
V. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Court:

1. Expedite consideration of the Petition for Writ of Habeas Corpus;
2. Expedite all related emergency motions, including the Motion for Immediate Release;
3. Set shortened briefing deadlines if necessary;
4. Grant any other relief deemed just and proper.

VI. 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