

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

FRANCISCO JAVIER

TORRES CRUZ (A# ,
Petitioner,

v.

Case No.: 2:26-cv-00729

WARDEN, SOUTH FLORIDA
DETENTION FACILITY;
FIELD OFFICE DIRECTOR,
ICE ERO MIAMI;
DIRECTOR, U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
SECRETARY, U.S. DEPARTMENT
OF HOMELAND SECURITY;
ATTORNEY GENERAL OF THE
UNITED STATES,
Respondents.

**EMERGENCY MOTION TO EXPEDITE CONSIDERATION AND
MEMORANDUM OF LAW**

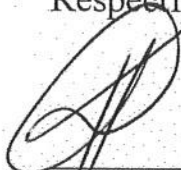
Petitioner respectfully moves this Court to expedite consideration of the pending Petition for Writ of Habeas Corpus.

1. Federal courts possess authority to expedite habeas proceedings under 28 U.S.C. §2243, which directs courts to 'summarily hear and determine the facts, and dispose of the matter as law and justice require.'
2. Each day of unlawful civil immigration detention constitutes irreparable injury. See *Zadvydas v. Davis*, 533 U.S. 678 (2001).

3. In *Boumediene v. Bush*, 553 U.S. 723 (2008), the Supreme Court emphasized that habeas corpus is designed to provide a prompt and effective judicial remedy for unlawful detention.
4. Recent federal immigration detention litigation across the country confirms that habeas petitions challenging detention are routinely resolved on expedited schedules.
5. The issues presented here are currently being litigated in numerous federal courts nationwide and therefore do not require extended factual development.

Accordingly, Petitioner respectfully requests that the Court order Respondents to respond within seven (7) days.

Respectfully submitted,



Karlene Gray Dawkins, Esq.
Florida Bar No. 690740
International Law Group, P.A.
1570 Lakeview Dr., Suite 8
Sebring, FL 33870
Telephone: (863) 402-9194
Email: intlawgroup@gmail.com
Counsel for Petitioner