

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TELETOR JIMENEZ, MARVIN
Petitioner,

v.

JAMISON, J.L., et. al

Respondents.

Case No.

**PETITION FOR
WRIT OF HABEAS CORPUS**

MOTION TO EXPEDITE ISSUANCE OF ORDER TO SHOW CAUSE

Petitioner, by and through counsel, motions this Honorable Court to expedite the order to show cause and avers the following in support of this motion:

1) That Petitioner filed a Petition for Writ of Habeas Corpus on March 16, 2026. *See* Dkt. 1.

2) That counsel for Petitioner provided a copy of the Petition and exhibits to Assistant United States Attorneys for the Eastern District at the following email addresses on Monday, March 16 at 4:52 p.m.:

- susan.becker@usdoj.gov
- gregory.david@usdoj.gov
- anthony.stjoseph@usdoj.gov

3) That Assistant United States Attorney Anthony St. Joseph confirmed receipt

of the Petition.

- 4) That counsel for Petitioner just learned that Respondent Immigration and Customs Enforcement claims that Petitioner signed an I-210 agreement for Voluntary Departure during his arrest on March 12, 2026. *See* Ex. 1, Voluntary Departure and Verification of Departure, I-210.
- 5) That the I-210 form was clearly signed by Petitioner's brother Josue Teletor, who was arrested at the same time as Petitioner.
- 6) That counsel for Petitioner has contacted Immigration and Customs Enforcement regarding the invalidity of this form, but has not received a response.
- 7) That in his Petition, Petitioner avers serious and constitutional matters pertaining to the alleged unlawful deprivation of his liberty interests. *See* ECF Dkt. 1.
- 8) That Petitioner is in immediate risk of transfer out of the court's jurisdiction.

WHEREFORE, Petitioner respectfully motions this Honorable Court to expedite the order to show cause and to stay transfer of Petitioner out of this Court's jurisdiction.

Respectfully Submitted,

Date: March 17, 2026

/s/ Caitlin Barry

PA 205501
Caitlin Barry, Esq.
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Villanova University Charles
Widger School of Law
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Villanova, PA 19085
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Phone: 484-800-1566
*Pro Bono Counsel for
Petitioner*

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Motion to Expedite using the CM/ECF system. I will furthermore send a courtesy copy via email to the office of the United States Attorney for the Eastern District of Pennsylvania at the email addresses listed within.

DATED: March 17, 2026

/s/ Caitlin Barry
PA 205501
Caitlin Barry, Esq.
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Phone: 484-800-1566
Pro Bono Counsel for Petitioner

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

VOLUNTARY DEPARTURE AND VERIFICATION OF DEPARTURE

To: (Alien's Last Name, First Name, and Address) MARVIN TELETOR JIMENEZ  PENNSYLVANIA, 191492130	Alien's Phone Number	A Number  FIN
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- ☐ You have violated the terms of your admission as a nonimmigrant. Consequently, the permission previously granted you to remain in the United States is rescinded. You are required to depart from the United States at your own expense on or before _____.
- ☒ On March 12, 2026 you were granted voluntary departure by the ☐ IJ ☐ BIA ☒ DHS. You are required to depart from the United States on or before April 13, 2026 ☐ at your expense. ☐ at government expense. ☒ under safeguard.
- ☐ Your request for an extension of time to depart from the United States has been _____ . You are required to depart on or before _____ .
(Granted/Denied)
- ☐ You state that you will be departing the United States on _____ through _____
(Port of Departure)
- on _____
(Give Airlines, Flight Number and Time or Other Manner of Departure)

NOTICE: The Immigration Judge's Alternate Order of Removal will take effect if the alien does not depart within the time specified. Failure to depart on or before the specified date may result in the withdrawal of voluntary departure and action being taken to effect your removal. A warrant for your arrest will be issued if this office has not received verification of your departure by the specified date. Failure to depart on or before the specified date may also subject you to a possible civil penalty of not less than \$1,000 and not more than \$5,000, and render you ineligible for a period of 10 years for any further authorization for voluntary departure or for relief under sections 240A, 245, 248, and 249 of the Immigration and Nationality Act.

Additionally, if an Immigration Bond has been posted on the alien, the DHS will initiate the appropriate action in accordance with the terms of the executed bond and any attached rider or riders specified.

To any U.S. official: This document can be completed and transmitted to DHS/ICE Headquarters Office of Enforcement and Removal via VD-Bond-Verifications@ice.dhs.gov.

Josue Teletor
Signature of Alien - Acknowledgment of Conditions and Receipt of Form

3/12/26
Date

ACIS
Signature of Authorized DHS Official
JOHN SCHLEAR - Deportation Officer

3/12/26
Date

DHS Official Serving Form (Name and Title)

PHILADELPHIA, PA, DOCKET CONTROL OFFICE

Office



If
Available



Verification of Departure (Completion by an official of the Department of Homeland Security or the U.S. Department of State)			
Signature of Official Verifying Identity		Date	Phone #:
		Office	
Printed Name/Title of Official Verifying Identity			
U.S. Departure Place			Date
Method of Departure	☐ Air ☐ Train ☐ Boat ☐ Other:		
Comments			