

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA**

VENANCIO ALEJANDRO PONCE TREJO)

Petitioner,

V.

CHARLES PARRA, in his official capacity )  
as Assistant Field Office Director, Krome )  
North Service Processing Center; GARRET )  
RIPA, in his official capacity as Miami Field )  
Office Director, Immigration and Customs )  
Enforcement's Enforcement and Removal )  
Operations; TODD LYONS, in his official )  
capacity as Acting Director of Immigration )  
and Customs Enforcement; KRISTI NOEM, )  
in her official capacity as Secretary of the )  
Department of Homeland Security; and )  
PAMELA BONDI, in her official capacity )  
as Attorney General; EXECUTIVE OFFICE )  
FOR IMMIGRATION REVIEW. )

### Respondents.

No. 2:26-cv-803-SPC-NPM

**MOTION TO AMEND CAPTION AND PETITION TO SUBSTITUTE  
PROPER RESPONDENT**

## INTRODUCTION

Petitioner, Venancio Ponce Trejo, submitted his Petition for Writ of Habeas Corpus on March 14, 2026. Doc 1. On March 16, 2026, Respondent, the United States Immigration and Customs Enforcement (“USCIS”), filed a Motion to Dismiss

or Transfer Action to the Middle District of Florida. Doc. 4. In support of the motion, Respondent provided Mr. Ponce Trejo's detention history which showed that he was detained at the Florida Soft-Sided Facility South in Ochope, Florida. Doc. 4. On March 18, 2026, Petitioner filed a Response stating that he did not oppose transferring the case to the Middle District of Florida. Doc. 7. Subsequently, Respondent filed a Reply withdrawing its request for dismissal and leaving its unopposed request to transfer the action to the Middle District of Florida. Doc. 8. The Honorable Altonaga ordered a transfer to the United States District Court for the Middle District of Florida, Fort Myers Division. Doc. 9.

### **ARGUMENT**

Petitioner respectfully requests that this Honorable Court grant leave to amend the Petition for Writ of Habeas Corpus and the Caption to allow for him to complete proper service upon the Respondents.<sup>1</sup> The immediate custodian of the Petitioner is no longer "Charles Parra." Instead, the immediate custodian is "Matthew Mordant," as he is the Warden of the Florida Soft Side South Facility, where Petitioner was detained. Petitioner is unable to have Summons issued to "Matthew Mordant" without him being named as a Respondent in this matter.

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<sup>1</sup> Petitioner also adjusted the font size of the petition to comply with the formatting requirements of the Middle District of Florida.

The proposed amendment would be to change “CHARLES PARRA, in his official capacity as Assistant Field Office Director, Krome North Service Processing Center;” to “MATTHEW MORDANT, in his official Capacity as Warden of the Florida Soft Side South, ‘Alligator Alcatraz.’” *See* Exh. A. There are no substantive changes to the Petition for Writ of Habeas Corpus, only changes for references to “Charles Parra” to “Matthew Mordant”, and altering the detention center from “Krome North Service Processing Center” to “Florida Soft Side South, ‘Alligator Alcatraz.’” For the convenience of the court, the proposed amendments are highlighted in Exhibit A. *See* Exh. A.

Petitioner respectfully requests this Honorable Court grant leave to amend the Petition for Writ of Habeas Corpus and the Caption to allow for him to complete proper service upon the Respondent. *See Foman v. Davis*, 371 U.S. 178, 182 (1962) (finding that leave to amend should be ‘freely given’ absent a clear reason, such as bad faith, undue prejudice to the opposing party, etc.).

### CONCLUSION

Petitioner respectfully requests that this Honorable Court grant leave to extend time to serve process on the Respondents, for good cause shown, or in the alternative, as a matter of discretion.

Respectfully submitted,

/s/ Viviana Inez Tijerino

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