

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
333 West Broadway, Suite 420
San Diego, California 92101

LILIANA DE LOS ANGELES CORTES OCHOA,
Petitioner,

v.

DIRECTOR, OTAY MESA DETENTION CENTER, et al.,
Respondents.

Case No. 26-cv-02284-AGS-DEB

MOTION FOR RECONSIDERATION
(Fed. R. Civ. P. 59(e) and 60(b))

I. INTRODUCTION

Petitioner, Liliana De Los Angeles Cortes Ochoa, respectfully requests that this Honorable Court reconsider the Order issued on May 4, 2026, denying without prejudice the Petition for Writ of Habeas Corpus filed pursuant to 28 U.S.C. § 2241.

This request is based on circumstances outside of Petitioner's control that prevented her Traverse from being fully received and considered prior to the Court's decision.

II. LEGAL BASIS

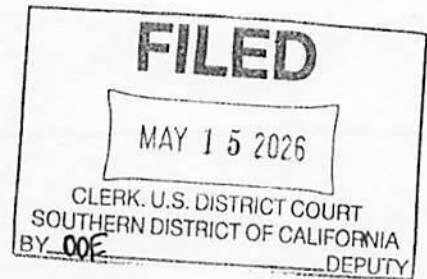
This motion is brought pursuant to:

- Federal Rule of Civil Procedure 59(e), which permits reconsideration of an order or judgment to correct manifest errors of fact or prevent manifest injustice;
- Federal Rule of Civil Procedure 60(b)(1) and 60(b)(6), which authorize relief based on mistake, extraordinary circumstances, or any other reason justifying relief.

Federal courts recognize that reconsideration is appropriate when:

- new relevant information exists;
- a procedural irregularity occurred; or
- reconsideration is necessary to prevent manifest injustice.

III. RELEVANT BACKGROUND



1. The Government filed its response to the Habeas Corpus Petition.
2. Petitioner was detained at the Otay Mesa Detention Center and depended entirely on the detention facility's internal system to receive legal correspondence and respond.
3. Petitioner did not physically receive the Government's response until May 1, 2026.
4. Due to this institutional delay, which was outside of Petitioner's control, Petitioner immediately prepared and mailed her Traverse on May 2, 2026.
5. The Traverse was subsequently docketed after the hearing held on May 4, 2026.
6. The oral hearing was conducted on Monday, May 4, 2026, immediately following the weekend.
7. Due to the close timing between:
 - the delayed receipt of the Government's response;
 - the immediate mailing of the Traverse;
 - the intervening weekend; and
 - the Monday hearing,

Petitioner reasonably believes that the Court did not have sufficient opportunity to fully receive and consider the Traverse before issuing its decision denying the Habeas Corpus Petition.

IV. DUE PROCESS CONCERNS AND NEED FOR RECONSIDERATION

Petitioner respectfully submits that:

the Court resolved the matter before fully considering Petitioner's response.

Petitioner acted diligently under the extremely limited circumstances inherent to immigration detention.

The delay was not caused by intentional negligence by Petitioner, but rather by:

- delays within the detention center's internal mail system;
- limited legal access; and
- restrictions inherent to immigration detention.

Denying reconsideration under these circumstances would result in manifest injustice and deprive Petitioner of a meaningful opportunity to respond to the Government's arguments.

V. IMPORTANCE OF THE FILED TRAVERSE

Petitioner's Traverse contained relevant constitutional arguments, including:

- prolonged detention exceeding seven months;
- a pending appeal before the BIA;
- absence of criminal history;
- documented psychological trauma;
- relevant medical conditions; and
- due process arguments under the Fifth Amendment.

These arguments are directly relevant to the constitutional analysis of prolonged detention.

VI. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

1. Reconsider the Order issued on May 4, 2026;
2. Fully consider Petitioner's filed Traverse;
3. Reopen the constitutional analysis of the Habeas Corpus Petition; and
4. Alternatively, grant any other relief this Court deems just and proper.

VII. VERIFICATION

I, Liliana De Los Angeles Cortes Ochoa, declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Liliana Cortes

LILIANA DE LOS ANGELES CORTES OCHOA
Pro Se
Otay Mesa Detention Center
7488 Calzada de la Fuente
San Diego, CA 92154
Date: 05-11-2026

I, Liliana De Los Angeles Cortes Ochoa, declare under penalty of perjury that:

1. I am currently detained at Otay Mesa Detention Center.
2. I did not receive the Government's response related to my habeas corpus case until May 1, 2026.
3. Due to my detained status, I depend entirely on the detention center's internal system to receive legal correspondence.
4. I prepared and mailed my Traverse on May 2, 2026, as soon as it was possible for me to do so.
5. I believe the Court did not have sufficient opportunity to fully review my Traverse before issuing its decision on May 4, 2026.

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

Liliana Cortes

Liliana De Los Angeles Cortes Ochoa

Pro Se

Date: 05-11-2026