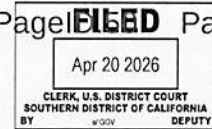


'26CV2381 DMS MMP



EMERGENCY MOTION FOR IMMEDIATE RELEASE PENDING ADJUDICATION

Petitioner moves for immediate release pending adjudication of the accompanying habeas petition. Federal courts retain authority in habeas proceedings to order release where extraordinary circumstances and a strong showing on the merits justify interim relief.

Immediate relief is warranted here because the petition raises substantial constitutional questions concerning present detention, each additional day of confinement causes irreparable liberty harm, and Respondents face no cognizable prejudice from release under reasonable supervision conditions if the Court deems such conditions necessary.

Petitioner seeks release because he has an active immigration case, a scheduled hearing, a direct incentive to appear, and no demonstrated basis in the present record to conclude that detention is the least restrictive means of securing appearance or public safety.

In the alternative, Petitioner requests an order setting an expedited briefing schedule and a prompt hearing on interim relief.

MEMORANDUM OF POINTS AND AUTHORITIES

1. To obtain interim release in a habeas proceeding, courts consider whether the petitioner raises substantial claims and whether extraordinary circumstances make the grant of bail necessary to render the habeas remedy effective.
2. Constitutional injury from unjustified physical confinement is paradigmatic irreparable harm. Once liberty is lost, it cannot later be restored for the time already spent in detention.
3. The requested relief is narrowly tailored. The Court may order release under supervision, reporting requirements, or other appropriate noncustodial conditions while retaining full authority to adjudicate the petition on the merits.

PRAYER

- Order Petitioner's immediate release pending adjudication of this matter; or
- Order Respondents to provide a prompt individualized custody hearing within a fixed period set by the Court; and
- Grant such other and further relief as justice requires.

Dated: 04/13/2026

[Signature]

Authorized Representative

Comisión Internacional de Derechos Humanos (CIDH USA)

