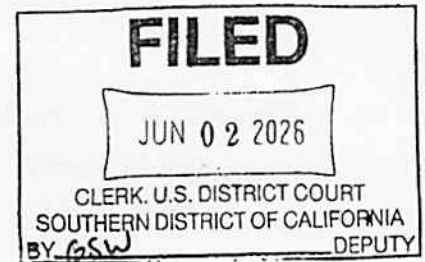


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



YORKY IZQUIERDO ALCANTARA,

Case No. 3:26-cv-02381-DMS-MMP

Petitioner,

PETITIONER'S EMERGENCY MOTION TO
EXPEDITE CONSIDERATION AND
REQUEST FOR IMMEDIATE RELIEF

v.

IMPERIAL REGIONAL DETENTION
FACILITY, et al.,

Judge: Hon. Dana M. Sabraw
Magistrate Judge: Hon. Michelle M. Pettit

Respondents.

**PETITIONER'S EMERGENCY MOTION TO EXPEDITE CONSIDERATION AND
REQUEST FOR IMMEDIATE RELIEF**

Petitioner Yorky Izquierdo Alcantara, proceeding pro se, respectfully moves this Court to expedite consideration of the pending habeas petition, the Traverse and Reply, and the request for immediate release or, alternatively, an expedited individualized bond hearing.

I. GOOD CAUSE EXISTS FOR EXPEDITED CONSIDERATION

Good cause exists because Petitioner remains detained while the constitutional and humanitarian issues in this habeas action are pending. Petitioner is separated from his United States citizen spouse and infant daughter. His family is suffering ongoing emotional and financial hardship, and the harm increases each day detention continues.

II. THE CASE IS FULLY DEVELOPED FOR PROMPT REVIEW

The Petition has been filed, the Court ordered a response, Respondents filed their Return, and Petitioner now submits a Traverse and Reply with supplemental humanitarian evidence. The matter is therefore in a posture where expedited consideration is appropriate.

III. PETITIONER IS NOT A DANGER OR MEANINGFUL FLIGHT RISK

Petitioner has no criminal history, has complied with immigration obligations, and has a stable release plan. Petitioner's wife is a United States citizen, is employed, and is prepared to receive and support Petitioner at the family residence. Petitioner is also the beneficiary of a pending I-130 petition accepted by USCIS.

IV. FAMILY HARDSHIP IS SEVERE AND ONGOING

Petitioner's infant daughter is a United States citizen and is at a highly dependent stage of development. Petitioner's spouse has been forced to carry the full emotional, childcare, and financial burden alone. Petitioner has experienced depression and emotional distress because he cannot assist his wife or care for his daughter while detained.

V. REQUEST FOR RELIEF

Petitioner respectfully requests that the Court:

1. Expedite consideration of the pending habeas petition;
2. Expedite consideration of Petitioner's Traverse and Reply;
3. Order Petitioner's immediate release from custody;
4. Alternatively, order an expedited individualized bond hearing or custody redetermination; and
5. Grant any additional relief the Court deems just and proper.

Respectfully submitted,

Date: 05 / 28 / 2026


YORKY IZQUIERDO ALCANTARA


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