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Attorney for the Petitioner

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

Ramila Patel a.k.a. Ruhin R. Momin

Petitioner,

Case No. 4:25-cv-277-CDL-AGH

GEORGE STERLING, Deputy Managing Director, Atlanta Field Office, Immigration and Customs Enforcement And Removal Operations (“ICE/ERO”); **TODD LYONS**, Acting Director of Immigration and Customs Enforcement (“ICE”); U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; **KRISTI NOEM**, Secretary of the Department of Homeland Security (“DHS”); U.S. DEPARTMENT OF HOMELAND SECURITY; **PAMELA BONDI**, Attorney General of the United States; **JASON STREEVAL**; Warden, Stewart Detention Facility, Lumpkin, GA.

**PETITION FOR WRIT
HABEAS CORPUS**

Respondents,

**MOTION TO EXPEDITE HEARING ON PETITION FOR WRIT OF HABEAS
CORPUS**

Petitioner, Ramila Patel a.k.a. Ruhin Momin (hereinafter “the Petitioner” or “Ms. Momin”), through the undersigned counsel, respectfully moves this Honorable Court to expedite Petitioner’s Writ of Habeas Corpus filed on September 8, 2025. In support of this motion, Petitioner states the following:

1. On September 8, 2025, Petitioner filed for a Writ of Habeas Corpus pursuant to 28 U.S.C. §2241. On September 12, 2025, this Honorable Court extended the time for a comprehensive response for twenty-one (21) days from the Respondents. Federal law grants this

Honorable Court the discretion to expedite court proceedings for good cause shown. 28 U.S.C. §1657(a).

2. The Petitioner, a sixty-one (61)-year-old female, has been unlawfully detained by the Immigration and Customs Enforcement (hereinafter “ICE”) for over twenty-four (24) days. She suffers from multiple chronic medical conditions, including hypertension, diabetes mellitus, and cholesterol. Since the commencement of her detention, the Petitioner has not had consistent access to adequate medical care or necessary medications. Failure to administer medications on time is exacerbating her condition. As a result, Petitioner’s health has been steadily deteriorating. The failure to administer Petitioner’s prescribed treatments in a timely manner is significantly exacerbating her medical conditions, placing her at serious risk of further harm. *Please see **Exhibit 1***, Letter from Petitioner’s Primary Care Practitioner, and ***Exhibit 2***, Petitioner's Laboratory Reports.

3. Additionally, on September 22, 2025, the petition for alien relative filed by Petitioner’s U.S. Citizen son, Mausufali Momin, has been approved by the United States Citizenship and Immigration Services (USCIS). *Please see **Exhibit 3***, I-130 Approval Notice. Petitioner is the beneficiary in the approved I-130 petition.

4. A delayed hearing would inflict irreparable harm on the Petitioner, as her health is progressively deteriorating with each passing day. Her continued confinement at the ICE detention facility would result in irreparable harm, given that her medical condition is worsening daily and continued delay in care poses a serious threat to her health and well-being.

For the Foregoing reasons, Petitioner respectfully requests that this Honorable Court grant this motion to expedite hearing on petition for Writ of Habeas Corpus to the soonest date available.

Respectfully submitted on September 5, 2025.

/s/ Bhavya Chaudhary

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CERTIFICATE OF SERVICE

I, Bhavya Chaudhary, Esq. hereby certify that a copy of the foregoing was mailed First class postage prepaid to the Respondents at the below mentioned addresses:

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