

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

HIFIS EDGARDO CABALLERO-
MURILLO,

Petitioner,

v.

Case No. 2:26-cv-45-KCD-DNF

IMMIGRATION AND CUSTOMS
ENFORCEMENT, SECRETARY,
U.S. DEPARTMENT OF
HOMELAND SECURITY, U.S.
ATTORNEY GENERAL, WARDEN
MATTHEW MORDANT, WARDEN
OF SOUTH FLORIDA
DETENTION CENTER;

Respondents.

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

Petitioner, HIFIS EDGARDO CABALLERO-MURILLO, by and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 65(a) and (b), M.D. Fla. L.R. 6.01, and M.D. Fla. L.R. 6.02(b), respectfully files this motion for temporary restraining order ("TRO") by May 21, 2026, during the pendency of this action seeking habeas relief to ensure the *status quo* is maintained.

INTRODUCTION

1. Petitioner HIFIS EDGARDO CABALLERO-MURILLO is in the physical custody of Respondents at Krome North SPC. He now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded Petitioner is subject to mandatory detention.

2. Petitioner HIFIS EDGARDO CABALLERO-MURILLO is a citizen of Honduras, who is a noncitizen previously released from immigration custody under an Order of Supervision (“OSUP”) pursuant to 8 C.F.R. § 241.4, on August 2, 2022.

3. Detention authority following a final order of removal is governed by 8 U.S.C. § 1231 and implementing regulations at 8 C.F.R. §§ 241.4 and 241.13.

4. When removal is not reasonably foreseeable, continued detention is constitutionally limited. *Zadvydas v. Davis*, 533 U.S. 678 (2001).

5. DHS regulations impose mandatory procedural safeguards before revoking an Order of Supervision, including notice, an opportunity to respond, and review by authorized officials.

6. Government agencies are constitutionally required to follow their own regulations. *Morton v. Ruiz*, 415 U.S. 199 (1974). 26. ICE, like any agency, “has the duty to follow its own federal regulations.” *Haoud v. Ashcroft*, 350

F.3d 201, 205 (1st Cir. 2003) (quoting *Nelson v. I.N.S.*, 232 F.3d 258, 262 (1st Cir. 2000)). To be sure, not every procedural misstep raises a constitutional issue. See *Matias v. Sessions*, 871 F.3d 65, 72 (1st Cir. 2017) (involving an inaccurate translation). However, where an immigration “regulation is promulgated to protect a fundamental right derived from the Constitution or a federal statute,” like the opportunity to be heard, “and [ICE] fails to adhere to it, the challenged [action] is invalid” *Waldron v. I.N.S.*, 17 F.3d 511, 518 (2d Cir. 1993); see also *Ying Fong v. Ashcroft*, 317 F.Supp.2d 398, 403–04 (S.D.N.Y. 2004) (granting alien's habeas petition where she was deported fewer than 72 hours after her arrest and regulation mandated 72–hour rule).

FACTS

7. On or about August 2, 2022, an IJ found Petitioner inadmissible under INA § 212(a)(6)(A)(i) (8 U.S.C. § 1182(a)(6)(A)(i)), and ordered Petitioner removed to Honduras. See Doc. 11-1 at 21-25. However, the IJ also entered an order withholding removal to Honduras, pursuant to INA § 241(b)(3), and 8 U.S.C. § 1231(b)(3).

8. The Order of Removal and Withholding of Removal was a final Order as both the Government and Petitioner waived their right to appeal. See Doc. 15-1 at 21-23.

9. Petitioner acknowledges that this Honorable Court previously denied his Emergency Motion for Temporary Restraining Order on January

14, 2026, finding, in part, that Respondents had not yet been provided an opportunity to respond, and although the claims raised by Petitioner were serious, they did not “justify an *ex parte* order of release.” See Doc. 6 at 4-5.

10. Respondents have been provided both an opportunity to respond, and an opportunity to file a supplemental response. Respondents, after asserting that Petitioner was detained pursuant to 241.4 in their Response (Doc. 11), changed course and argued that Petitioner’s bond was revoked pursuant to 8 U.S.C. § 1226(b).

11. On May 19, 2026, Petitioner was provided an informal interview with DHS/ICE in regards to possible third countries where Petitioner could be safely removed. At no point in this interview did Respondents state the basis of Petitioner’s detention. At no point did Respondents provide Petitioner with an opportunity to contest his detention.

12. Petitioner maintains that this is the first time he provided and informal interview, and the first time he was informed that DHS/ICE is seeking to remove him to a third county, other than Honduras. Undersigned counsel was present for this interview.

13. Furthermore, Petitioner is diabetic, and it has become increasingly difficult for Mr. Caballero to receive adequate medical treatment, including his medication.

14. The facts alleged establish that Petitioner faces immediate and irreparable harm and that notice is impracticable, thereby satisfying Rule 65(b) and demonstrating that no notice is required for issuance of a temporary restraining order.

15. Pursuant to M.D. Fla. L.R. 6.02(b), Petitioner has established by clear and convincing evidence an extraordinary circumstance not requiring notice. As such, Petitioner requests that this Court enter an Order enjoining and restraining Respondents and any and all parties acting in concert with them from continuing to unlawfully detain Petitioner, or in the alternative, from transferring Petitioner outside of the Middle District of Florida while the instant habeas proceedings are pending.

LEGAL STANDARD

16. “A plaintiff seeking a preliminary injunction must establish that ... the balance of equities tips in [their] favor, and that an injunction is in the public interest.” *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008).

17. The Court should grant a preliminary injunction if Petitioner establishes: (1) “a substantial likelihood of success on the merits,” (2) “that the preliminary injunction is necessary to prevent irreparable injury,” (3) “that the threatened injury outweighs the harm the preliminary injunction would cause the other litigant[s],” and (4) “that the preliminary injunction would not be averse to the public interest.” *Chavez v. Fla. SP Warden*, 742 F.3d 1267, 1271

(11th Cir. 2014). The same test applies to a motion for a temporary restraining order. *Schiavo ex rel. Schindler v. Schiavo*, 403 F.3d 1223, 1225-26 (11th Cir. 2005).

ARGUMENT

I. Petitioner's Removal is Not Reasonably Foreseeable.

18. On or about December 29, 2025, ICE re-detained Petitioner due to its own failure to properly execute an Order of Release on Supervision pursuant to 8 C.F.R. § 241.4, and properly document Petitioner's release under the appropriate law. *See* 8 U.S.C. § 1231. Nonetheless, Respondents re-detained Petitioner and transported him to ICE/ERO. After Mr. Caballero-Murillo's re-detention, ICE/ERO personnel have repeatedly transferred Petitioner, limited Petitioner's access to counsel, and attempted to repatriate Petitioner to Africa (without notice), and now to Mexico, where he lacks patriation, citizenship, permission and/or authorization, to enter.

19. Pursuant to 8 C.F.R. § 241.4(b)(3), noncitizens, like Petitioner, who are "granted withholding of removal under section 241(b)(3) of the Act or withholding or deferral of removal under the Convention Against Torture who are otherwise subject to detention **are subject to the provisions of this part 241.**" (emphasis added). Under this same section, "[a] copy of any decision by the district director, Director of the Detention and Removal Field Office, or

Executive Associate Commissioner **to release or to detain an alien shall be provided to the detained alien.**” See 8 C.F.R. § 241.4(d) (emphasis added).

20. Furthermore, the section also requires that the Government provide proper notice to Petitioner, in connection with any custody reviews conducted under this section **to be served on Petitioner in accordance with 8 C.F.R. § 103.8.** See 8 C.F.R. § 241.4(d)(2) (emphasis added). It also requires that “[c]opies of all such documents **will be retained in the alien’s record** and forwarded to the HQPDU.” *Id.* Nevertheless, Respondents claim to have lost Petitioner’s “A-File” and the relevant documents which are required by 8 C.F.R. § 241.4. See Doc. 11 at 9.

21. Respondents attempt to circumvent the requirements of 8 C.F.R. § 241.4, by arguing that 8 U.S.C. § 1226(a), allows for the government to release a noncitizen on bond. See Doc. 15 at 4. Respondents contend that it is within the Government’s discretion under 8 U.S.C. § 1226(b) to revoke the noncitizen’s bond at any time. *Id.* However, Respondents arguments aren’t just wrong, they’re contrary to the plain reading of both the relevant regulations and the pertinent statutes, as 8 U.S.C. § 1226, applies **only to noncitizens who are pending immigration proceedings, with no final order of removal entered.** (emphasis added). See *Hernandez Alvarez v. Warden, Fed. Det. Ctr. Miami*, No. 25-14065, 2026 WL 1243395 at *2 (11th Cir. May 6, 2026) (holding that 8 U.S.C. § 1226(a) applies to a noncitizen *pending a decision on whether*

the noncitizen is to be removed from the United States. (citation and quotation omitted)).

22. The Due Process Clause prohibits deprivations of life, liberty, and property without due process of law. *See* U.S. Const. amend. V. It is firmly established that these protections extend to noncitizens present in the United States. *Zadvydas v. Davis*, 533 U.S. 678, 693, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001) (“[T]he Due Process Clause applies to all ‘persons’ within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.”); *Wong Wing v. United States*, 163 U.S. 228, 238, 16 S.Ct. 977, 41 L.Ed. 140 (1896) (“It must be concluded that all persons within the territory of the United States are entitled to the protection guaranteed by [the Fifth Amendment], and that even aliens shall not ... be deprived of life, liberty, or property without due process of law.”); *Trump v. J. G. G.*, — U.S. —, 145 S. Ct. 1003, 1006, 221 L.Ed.2d 529 (2025) (quoting *Reno v. Flores*, 507 U.S. 292, 306, 113 S.Ct. 1439, 123 L.Ed.2d 1 (1993)) (cleaned up) (“It is well established that the Fifth Amendment entitles aliens to due process of law in the context of removal proceedings.”).

23. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty [the Due Process Clause] protects.” *Zadvydas*, 533 U.S. at 690, 121 S.Ct. 2491. Generally, the Due Process Clause “requires some kind of a hearing before the

State deprives a person of liberty or property.” *Zinerman v. Burch*, 494 U.S. 113, 127, 110 S.Ct. 975, 108 L.Ed.2d 100 (1990).

24. Even individuals who face significant constraints on their liberty or over whose liberty the government wields significant discretion retain a protected interest in their liberty. *See Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970 (N.D. Cal. 2019) (“The fact that a decision-making process involves discretion does not prevent an individual from having a protectable liberty interest.”); *Hurd v. D.C., Gov’t*, 864 F.3d 671, 683 (D.C. Cir. 2017) (holding that re-detention after pre-parole conditional supervision requires a pre-deprivation hearing); *Gagnon v. Scarpelli*, 411 U.S. 778, 782, 93 S.Ct. 1756, 36 L.Ed.2d 656 (1973) (same, in probation context); *Morrissey v. Brewer*, 408 U.S. 471, 482, 92 S.Ct. 2593, 33 L.Ed.2d 484 (1972) (same, in parole context).

25. Applying these principles, it is clear that Mr. Caballero-Murillo has a protected liberty interest in being free from official restraint. Respondent(s) are unlawfully re-detaining Petitioner under 8 U.S.C. § 1226(a), without following the regulations it implemented at 8 C.F.R. §§ 241.4 and 241.13. Respondent(s) failed to provide Petitioner with notice of the reasons for revoking his supervision, did not conduct a prompt informal interview, and did not provide Petitioner an opportunity to contest the alleged grounds for re-detention. As a result, Petitioner’s continued re-detention is unconstitutional.

26. ICE, like any agency, “has the duty to follow its own federal regulations.” *Haoud v. Ashcroft*, 350 F.3d 201, 205 (1st Cir. 2003) (quoting *Nelson v. I.N.S.*, 232 F.3d 258, 262 (1st Cir. 2000)). To be sure, not every procedural misstep raises a constitutional issue. See *Matias v. Sessions*, 871 F.3d 65, 72 (1st Cir. 2017) (involving an inaccurate translation). However, where an immigration “regulation is promulgated to protect a fundamental right derived from the Constitution or a federal statute,” like the opportunity to be heard, “and [ICE] fails to adhere to it, the challenged [action] is invalid” *Waldron v. I.N.S.*, 17 F.3d 511, 518 (2d Cir. 1993); see also *Ying Fong v. Ashcroft*, 317 F.Supp.2d 398, 403–04 (S.D.N.Y. 2004) (granting alien's habeas petition where she was deported fewer than 72 hours after her arrest and regulation mandated 72-hour rule).

27. Against this backdrop, this Court must address the question presented here which is to determine if Petitioner was afforded the necessary due process required to protect his fundamental right to be free from unnecessary government restraint. A protected liberty interest may arise from a conditional release from physical restraint. *Young v. Harper*, 520 U.S. 143, 147–49 (1997). Even when a statute allows the government to arrest and detain an individual, a protected liberty interest under the Due Process Clause may entitle the individual to procedural protections not found in the statute. See *id.* (due process requires pre-deprivation hearing before revocation of pre-

parole); *Gagnon v. Scarpelli*, 411 U.S. 778, 782 (1973) (same, in probation context); *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972) (same, in parole context).

28. To determine whether a specific conditional release rises to the level of a protected liberty interest, “[c]ourts have resolved the issue by comparing the specific conditional release in the case before them with the liberty interest in parole as characterized by *Morrissey*.” *Gonzalez-Fuentes v. Molina*, 607 F.3d 864, 887 (1st Cir. 2010) (internal quotation marks and citation omitted). In *Morrissey*, the Supreme Court explained that parole from a criminal conviction “enables [the parolee] to do a wide range of things open to persons” who have never been in custody or convicted of any crime, including to live at home, work, and “be with family and friends and to form the other enduring attachments of normal life.” *Morrissey*, 408 U.S. at 482. “Though the [government] properly subjects [the parolee] to many restrictions not applicable to other citizens,” such as monitoring and seeking authorization to work and travel, his “condition is very different from that of confinement in a prison.” *Id.* “The parolee has relied on at least an implicit promise that parole will be revoked only if he fails to live up to the parole conditions.” *Id.* The revocation of parole undoubtedly “inflicts a grievous loss on the parolee.” *Id.* (quotations omitted). Therefore, a parolee possesses a protected interest in his “continued liberty.” *Id.* at 481–84.

29. In the instant case, Petitioner's parole from detention is similar. For over three (3) years, it allowed him to establish ties in the community while pursuing relief in his removal proceedings. He received employment authorization, was gainfully employed, and supported his family. These actions were made possible by Petitioner's freedom, which is "the most elemental of liberty interests[.]" *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004).

30. Mr. Caballero-Murillo would be deprived of his due process protections under the Fifth Amendment if he were to continue to be detained and/or transferred outside of this Court's jurisdiction, as ICE/ERO's re-detention is invalid. Therefore, Mr. Caballero-Murillo has a due process right to his immediate release and/or to have his Petition for Writ of Habeas Corpus decided prior to being transferred or removed out of this Court's jurisdiction.

31. Although the Government has a legitimate interest in the "prompt execution of removal orders," *Hernandez-Lara v. Lyons*, 10 F.4th 19, 32 (1st Cir. 2021), "there is a public interest in preventing aliens from being wrongfully removed, particularly to countries where they are likely to face substantial harm," *Nken v. Holder*, 556 U.S. 418, 436 (2009).

32. Because Respondent's improperly re-detained Mr. Caballero-Murillo without providing him the due process protections afforded in 8 U.S.C. § 1231 and 8 C.F.R. §§ 241.4 and 241.13, ICE/ERO's re-detention of Petitioner is invalid. Additionally, Respondent(s) have not identified any violation of

supervision conditions, new removal prospects, or changed circumstances justifying re-detention under the governing regulations.

33. As such he is seeking this Court to enjoin the Respondent's from continuing to illegally detain him and/or from transferring him outside of this Court's jurisdiction until such time as either he is released from custody; and/or this Court enters a final order on his Petition for Writ of Habeas Corpus.

II. Respondent(s) Illegal Detention of Petitioner Causes Petitioner Irreparable Harm

34. "It is well established that the deprivation of constitutional rights unquestionably constitutes irreparable injury." *Gayle v. Meade*, 614 F. Supp. 3d 1175, 1205 (S.D. Fla. 2020). Without interim relief to maintain the status quo, Petitioner could be removed from this Court's jurisdiction, effectively foreclosing any recourse. *See, e.g., Zapeta v. Exec. Dir. of the Fla. Div. of Emergency Mgmt.*, No. 2:25-CV-00697-JLB-KCD, 2025 WL 2432501, at *3 (M.D. Fla. Aug. 22, 2025) (denying habeas petition as moot where petitioner had been deported because, "[a]s a general rule, a habeas petition presents a live case or controversy only when a petitioner is in custody").

35. ICE re-detained Petitioner without complying with 8 C.F.R. § 241.4. The regulations require notice of the reasons for revocation and a prompt informal interview allowing the noncitizen to respond. Both 8 C.F.R. §§ 241.4 and 241.13, require notice upon revocation of OSUP, and an informal

interview, as these “regulations [are] designed to afford [Petitioner] due process[.]” See *Maryanovsky v. Ripa*, No. 3:25-cv-1599-MMH-SJH, 2026 WL 496778 at *4 (M.D. Fla. Feb. 23, 2026) (Howard, C. J.).

36. Here, there was no Notice provided, as Respondents admit to having lost Petitioner’s A-File. Moreover, there was no Form I-220(B) ever properly issued or served upon Petitioner, and thus Respondents could not have possibly provided Petitioner with notice. *Fuentes v. Ripa*, No. 3:26-CV-134-MMH-PDB, 2026 WL 717982 at *3 (M.D. Fla. Mar. 16, 2026) (Howard, C.J.) (finding that a notice of revocation of OSUP, which simply tracks the statutory language, in effect provides no notice at all.). Sections 241.4 and 241.13 both require ICE to provide “an initial informal interview promptly ... to afford the alien an opportunity to respond to the reasons for revocation.” See §§ 241.4(l)(1), 241.13(i)(3). ICE failed to provide these procedural protections.

37. The instant case is eerily similar to *Sanchez- Sequera v. Ripa*, No. 2:26CV01369-SPC-DNF, 2026 WL 1290490 (M.D. Fla. May 12, 2026), wherein “ICE decided internally that it could [re-]detain [the Petitioner] to attempt removal to a third country.” *Id.* at *1. In *Sanchez-Sequera*, the court found:

The government has bungled this case from the beginning. It decided to detain Sanchez-Sequera through an internal conversation, and it did not notify him of the reason for his detention on March 18, 2026, or any time thereafter. Because Sanchez-Sequera has not received notice of the reason for revocation, he has had no meaningful opportunity to contest it. And when ordered to show cause why Sanchez-Sequera's habeas

petition should not be granted, the government cited detention authority that obviously does not apply here, made irrelevant legal arguments, and failed to address the petition's key factual allegations. More to the point, ICE did not meaningfully follow § 241.4(l), which establishes the process due in this situation, and thereby violated Sanchez-Sequera's right to due process. *See Zhu v. Genalo*, 798 F. Supp. 3d 400 (S.D.N.Y. 2025) (collecting cases that reach the same conclusion based on similar facts).

Sanchez-Sequera, 2026 WL 1290490 at *2 (emphasis added).

38. This Court should likewise find the same here. The revocation of Petitioner's supervised release without due process renders his current detention unlawful. *See e.g., Noem v. Abrego Garcia*, 145 S. Ct. 1017, 1019 (2025) (SOTOMAYOR, J., concurring). The government's detention of Petitioner without following the due process protections contained in 8 U.S.C. § 1231 and 8 C.F.R. §§ 241.4 and 241.13 violates his right to due process. Leaving Petitioner in prolonged detention at a dangerous facility where he is unable to communicate medical issues, and other urgent problems places them at serious risk of prolonged detention, injury, and death—all of which are irreparable. *Fla. Immigrant Coal. v. Uthmeier*, No. 25-21524-CV, 2025 WL 1423357, at *12 (S.D. Fla. Apr. 29, 2025) (finding the risk of unlawful "detention" supported irreparable harm).

III. The Balance of Equities and the Public Interest Weigh Heavily in Petitioner's Favor

39. Lastly, the balance of equities and public interest heavily favors Petitioner's request for injunctive relief. Petitioner is simply requesting what

other courts across the nation have repeatedly granted, that this Court Order his immediate release, as the Government has not provided a lawful basis for his detention, or in the alternative, that he remain within its jurisdiction until his habeas petition is decided. The harm to the Government is minimal. And because Mr. Caballero-Murillo is being illegally re-detained pursuant to 8 U.S.C. § 1231 and 8 C.F.R. §§ 241.4 and 241.13, neither equity nor the public's interest are furthered by holding him under an invalid agency decision. *See Nken v. Holder*, 556 U.S. 418, 436 (2009) (“Of course there is a public interest in preventing aliens from being wrongfully removed[.]”).

IV. The Court Should Not Require Petitioner to Provide Security Prior to the Temporary Restraining Order

40. Federal Rule of Civil Procedure 65(c) provides that “[t]he court may issue a preliminary injunction or a temporary restraining order only if the movant gives security in an amount that the court considers proper to pay the costs and damage sustained by any party found to have been wrongfully enjoined or restrained.” Decisions regarding the security required to be posted in connection with the issuance of preliminary relief “are entrusted to the discretion of the district court,” including the discretion to “elect to require no security at all.” *Transcon. Gas Pipe Line Co., LLC v. 6.04 Acres*, 910 F.3d 1130, 1171 (11th Cir. 2018) (quoting *Corrigan Dispatch Co. v. Casa Guzman, S. A.*, 569 F.2d 300, 303 (5th Cir. 1978)). District courts exercise this discretion to

require no security in cases brought by indigent, detained, and/or incarcerated people, those seeking to exercise their constitutional rights, and in cases that benefit the public interest. *See, e.g. Campos v. I.N.S.*, 70 F. Supp. 2d 1296, 1310 (S.D. Fla. 1998); *Complete Angler, LLC v. City of Clearwater, Fla.*, 607 F. Supp. 2d 1326 (M.D. Fla. 2009); Wright & Miller, Fed. Practice & Proc. § 2954.

41. This Court should do so here.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court temporarily enjoin the Respondent(s) from the following:

- a. Continuing Mr. Caballero-Murrillo's detention; or in the alternative,
- b. transferring or relocating Mr. Caballero-Murillo outside the jurisdiction of the Middle District of Florida pending a ruling on the habeas petition; and
- c. Grant any other and further relief that this Court deems just and proper.

DATED this 20th day of May, 2026.

Respectfully submitted,

By: /s/Joel Alexis Caminero /
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VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF

I, Joel Alexis Caminero, Esq., counsel for the Petitioner, HIFIS EDGARDO CABALLERO-MURILLO, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am the attorney of record for Petitioner in this matter.
2. On or about May 17, 2026, I personally met with Petitioner again, in preparation of his informal interview, via telephone conference for approximately one hour.
3. During that meeting, I reviewed the facts of this case directly with Petitioner, including the circumstances of his arrest, detention, and subsequent transfers.
4. Petitioner confirmed the accuracy of the factual allegations and provided corrections where necessary, which have been incorporated into this filing.
5. The factual allegations contained in this Motion are based on:
 - (a) my direct communications with Petitioner;
 - (b) Petitioner's personal knowledge; and
 - (c) supporting documentation where available.
6. Based on the foregoing, I attest that the factual allegations contained in this Emergency Motion for Temporary Restraining Order are true and correct to the best of my personal knowledge and based on information provided by Petitioner with firsthand knowledge of the events described.

Executed on this 20th day of May, 2026.

/s/Joel Alexis Caminero /
Joel Alexis Caminero, Esq.
Florida Bar # 127294

Attorney for Petitioner

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to all counsel in this case on May 20, 2026.

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