FILED
APR 13 2026
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY
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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

EL PASO DIVISION

Petitioner: LUIS FERNANDO NAULA JUCA

A-Number: [redacted]

v.

Respondents:

MARY DE ANDA-YBARRA, in her official capacity as Field Office Director of Enforcement and Removal Operations, El Paso Field Office, Immigration and Customs Enforcement;

TODD M. LYONS, in his official capacity as Acting Director, Immigration and Customs Enforcement, U.S. Department of Homeland Security;

KRISTI NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security;

PAMELA JO BONDI, in her official capacity as Attorney General of the United States; and

WARDEN, ERO EL PASO CAMP EAST MONTANA

Case No: 3:26-CV-00271-LS

PRO SE EMERGENCY MOTION FOR EXPEDITED RELIEF AND IMMEDIATE RELEASE BASED ON URGENT HUMANITARIAN GROUNDS

I, Luis Fernando Naula Juca, respectfully submit this emergency motion requesting expedited relief and immediate release in connection with my pending Petition for Writ of Habeas Corpus.

I have been detained since January 27, 2026, at ERO El Paso Service Processing Center (East Montana), located at 6920 Digital Road, El Paso, Texas 79936.

I am a native and citizen of Ecuador and an asylum seeker in the United States. I have no criminal history and have fully complied with all immigration requirements.

The day before my detention, I attended my scheduled ICE appointment and complied with all reporting obligations. At that time, I was under ISAP supervision and wearing an ankle monitor. I never missed any appointments and consistently followed all conditions imposed on me.

On January 27, 2026, at approximately 8:30 a.m., while leaving my home in my vehicle, I was stopped and detained by multiple ICE officers arriving in approximately six vehicles. Despite my full compliance, I was taken into custody and transferred the same day to the detention facility where I remain detained.

I had an immigration court hearing on March 19, 2026, where the Immigration Judge instructed me to refile my asylum application. My next hearing is scheduled for April 14, 2026. I have been actively pursuing my asylum case since my entry into the United States approximately one year and nine months ago. I also have a valid work permit and have maintained my case in good standing.

This motion is filed on an emergency basis due to severe and urgent humanitarian circumstances involving my minor daughter.

My daughter, [redacted] Rodriguez, age 14, who resides in Ecuador, has been diagnosed with acute lymphoblastic leukemia, a life-threatening and rapidly progressing disease.

As confirmed in the attached medical certificate (Exhibit B), my daughter required immediate hospitalization and began urgent medical treatment, including intensive care and chemotherapy. The medical documentation establishes that her condition is critical and requires continuous treatment and permanent care by her mother.

Additionally, as stated in the letter from her mother (Exhibit A), the treatment is extremely costly, and her mother is unable to work due to the need to provide full-time care.

My detention prevents me from providing essential financial support and emotional assistance during this life-threatening situation. As her father, I have always been responsible and actively involved in her life, and my presence is critical for her support and survival.

I respectfully submit that continued detention under these circumstances raises serious concerns of fundamental fairness and due process.

Furthermore, I do not pose a danger to the community nor a flight risk. I have no criminal record, I fully complied with ISAP supervision, and I consistently attended all required ICE appointments prior to my detention.

Given my full compliance, lack of criminal history, ongoing asylum proceedings, and the urgent and life-threatening medical condition of my daughter, I respectfully request that this Court:

1. Grant this motion on an expedited basis;

2. Order my immediate release from detention; or

3. Grant any other relief the Court deems just and proper.

Respectfully submitted,



Luis Fernando Naula Juca

Pro Se Petitioner

A-Number: [redacted]

ERO El Paso Service Processing Center

(East Montana)

6920 Digital Road

El Paso, TX 79936

Unit: Delta 13, Bed 40

Date: March 30, 2026

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

EL PASO DIVISION

Petitioner: Luis Fernando Naula Juca

A-Number: [redacted]

v.

Respondents:

MARY DE ANDA-YBARRA, in her official capacity as Field Office Director of Enforcement and Removal Operations, El Paso Field Office, Immigration and Customs Enforcement;

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WARDEN, ERO EL PASO CAMP EAST MONTANA

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CERTIFICATE OF SERVICE

I, Luis Fernando Naula Juca, certify that on this date I mailed a true and correct copy of this Emergency Motion for Expedited Relief and Immediate Release, along with all

supporting exhibits, to the Office of the United States Attorney for the Western District of Texas, which represents the Respondents in this matter.

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



Luis Fernando Naula Juca

Pro Se Petitioner

A-Number: [redacted]

ERO El Paso Service Processing Center

(East Montana)

6920 Digital Road

El Paso, TX 79936

Unit: Delta 13, Bed 40

Date: March 30, 2026

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