

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF NEW MEXICO**

BLAIDEL MARIN RAMOS

A 

Petitioner,

v.

Case No.: 1:26-cv-00264

Mr. George Dedos, Warden of Cibola County
Correctional Center; Mary De Anda-Ybarra,
ICE District Director, Cibola, New Mexico; The
Honorable Ms. Kristi Noem, in her capacity as
Secretary of Homeland Security; The
Honorable Ms. Pam Bondi in her capacity as
Attorney General of the United States,

Respondents.

**EMERGENCY MOTION TO ORDER DHS NOT TO TRANSFER PETITIONER PENDING
RESOLUTION OF PETITION FOR WRIT OF HABEAS CORPUS**

Petitioner, **Blaidel Marin Ramos**, by and through undersigned counsel, **Greg Chonillo**, respectfully moves this Honorable Court for an Order prohibiting the Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), and all persons acting in concert with them from transferring Petitioner from his current place of detention while his Petition for Writ of Habeas Corpus remains pending before this Court. In support of this request, Petitioner would respectfully show the following:

1. That Petitioner is currently detained at Cibola County Correctional Center in Cibola County, New Mexico, within the jurisdiction of this Honorable Court.
2. That a Petition for Writ of Habeas Corpus is presently pending before this Court challenging the legality of Petitioner's detention.
3. That ICE routinely transfers detained individuals without prior notice, including while habeas proceedings are pending.
4. That Respondents possess the authority and ability to transfer Petitioner at any time to another ICE detention facility.

5. That transferring Petitioner during the pendency of this action would cause irreparable harm, including but not limited to:
 - o Interfering with Petitioner's ability to meaningfully consult with counsel;
 - o Disrupting and delaying adjudication of the pending habeas petition; and
 - o Potentially impairing this Court's jurisdiction to grant effective relief.
6. That federal courts possess inherent authority to issue orders necessary to preserve their jurisdiction, and courts routinely prohibit the transfer of detainees where such transfer would frustrate judicial review.
7. That maintaining Petitioner at Cibola County Correctional Center during the pendency of this action imposes minimal burden on Respondents, while serving the interests of justice, judicial economy, and due process.

WHEREFORE, Petitioner, through undersigned counsel, respectfully requests that this Honorable Court Order DHS, ICE, and all agents thereof not to transfer Petitioner Blaidel Marin Ramos from Cibola County Correctional Center pending final resolution of the Petition for Writ of Habeas Corpus; and Grant such other and further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 6th, 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record pro se parties identified on the attached service list in the manner specified, either via transmission of Notices of Electronic filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically notices of Electronic Filing.

Respectfully submitted,



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