

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

REC'D MAR 16 2 54 PM 11:00
MDGA-MAC

J.T., Petitioner,

v.

Warden, Stewart Detention Center, et al., Respondents.

Case No. 4:26-cv-213-CDL-AGH

RESPONSE TO COURT ORDER REGARDING NEXT FRIEND STATUS

COMES NOW Mia Cristal Guzman Tapia and respectfully submits this response to the Court's Order requesting additional information regarding next friend status. 1. I am the daughter of the Petitioner, Johanny Tapia Guzman, who is currently detained at Stewart Detention Center. 2. The Petitioner has significant difficulty pursuing legal matters on her own behalf while detained. 3. The Petitioner primarily speaks Spanish and has limited ability to read, write, and understand English legal documents. This language barrier makes it extremely difficult for her to understand court procedures or prepare legal filings without assistance. 4. In addition to the language barrier, the Petitioner has been experiencing severe emotional distress while detained, including depression, anxiety, stress, malnutrition, and physical symptoms such as hair loss and chronic fatigue. 5. The conditions of detention and limited access to legal materials make it extremely difficult for the Petitioner to prepare and file legal pleadings on her own. 6. Because of these circumstances, I filed the habeas petition as her next friend in order to protect her rights and seek judicial review of her detention. 7. I respectfully request that the Court allow this matter to proceed with me acting as next friend for the Petitioner. Respectfully submitted,

Signature: Mia Guzman

Mia Cristal Guzman Tapia

Next Friend for Petitioner

Date: 03/09/2026

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

J.T., Petitioner,

v.

Warden, Stewart Detention Center, et al., Respondents.

Case No. 4:26-cv-213-CDL-AGH

RESPONSE TO COURT ORDER REGARDING NEXT FRIEND STATUS

I, Mia Cristal Guzman Tapia, respectfully submit this response to the Court's Order requesting additional information regarding my standing to proceed as "next friend" on behalf of the Petitioner in this habeas corpus action under 28 U.S.C. § 2241.

I am the biological daughter of the Petitioner. Because of this close familial relationship, I have a significant personal interest in protecting her legal rights and ensuring that she is not unlawfully detained. My actions in filing this petition were made in good faith and solely for the purpose of seeking judicial review of the legality of her detention.

The Petitioner is currently detained at Stewart Detention Center in immigration custody. While detained, her ability to prepare and file legal pleadings on her own behalf is severely limited. She has restricted access to legal resources, limited ability to communicate with the outside world, and faces substantial emotional and psychological stress due to the conditions of her confinement. These circumstances significantly impair her ability to effectively protect her own legal interests without assistance.

Because of these limitations, the Petitioner is not in a position to meaningfully pursue this legal action herself. As her daughter, I stepped forward to file the petition as her next friend in order to ensure that her constitutional rights are protected and that the legality of her detention can be reviewed by this Court.

My involvement is motivated solely by my responsibility as an immediate family member and by my sincere concern for the Petitioner's welfare and legal rights. I respectfully submit that the combination of (1) my close familial relationship to the Petitioner and (2) the practical barriers she faces while detained establishes good cause for this Court to recognize my standing to proceed as next friend in this matter.

For these reasons, I respectfully request that the Court accept this explanation of my next friend status and allow the habeas corpus proceedings to move forward so that the merits of the petition may be considered.

Respectfully submitted,

Mia Cristal Guzman Tapia

Next Friend for Petitioner

Date: 03/09/2026