

FILED MAY 4 2026
MDDH-CDL

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF GEORGIA

MIA CRISTAL GUZMAN TAPIA, as Next Friend of JOHANNY TAPIA GUZMAN,

Petitioner,

v.

WARDEN, STEWART DETENTION CENTER,

Respondent.

Case No.: 4:26-cv-00213-CDL-AGH

PETITIONER'S REPLY IN OPPOSITION TO RESPONDENT'S MOTION TO DISMISS

Petitioner respectfully submits this Reply and states:

I. Respondent relies on factual errors. Petitioner never knowingly requested voluntary departure. Any such indication is due to language barriers and lack of representation.

II. Petitioner is not a danger. She has strong moral character, community support, pays taxes, and is a mother and caregiver, including to Cristian Guillermo Guzman Tapia and a U.S. citizen grandchild.

III. The criminal case is pending. No conviction exists, and bond was granted, showing eligibility for release.

IV. Petitioner is not a flight risk. She has stable housing, family ties, and history of compliance.

V. Detention is prolonged. Petitioner has been detained for 4 months and 10 days without resolution.

VI. Humanitarian factors support release. Family depends on her, and her daughter is enlisting in the U.S. Army to pursue Parole in Place. Petitioner has a pending I-130.

VII. Alternatively, Petitioner seeks supervised release and agrees to comply with all conditions.

CONCLUSION

Petitioner respectfully requests denial of Respondent's motion and grant of habeas relief, including release or bond hearing.

Respectfully submitted,

Mia Guzmán
On: 04/18/2026
Mia Cristal Guzman Tapia

Next Friend of Johanny Tapia Guzman

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA**

Case No.: 4:26-cv-00213-CDL-AGH

CERTIFICATE OF SERVICE

I, Mia Cristal Guzman Tapia, hereby certify that on this date: 04/20/2026, I mailed a true and correct copy of the foregoing documents in this habeas corpus case to the following:

Office of the United States Attorney

Middle District of Georgia

P.O. Box 1702

Macon, GA 31202-1702

via United States Postal Service.

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

Signature: Mia Guzmán

Mia Cristal Guzman Tapia

Date: 04/20/2026