

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Alan Ricardo Lopez Alvarez
Petitioner-Plaintiff,

v.

Miguel Vergara,
Field Office Director
U.S. Immigration and Customs Enforcement;

Bobby Thompson,
Facility Warden
South Texas Detention Facility,

Respondents-Defendants

Civ. No. 5:26-cv-00907

DHS File Number: 

**EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO
28 U.S.C. §2241 AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

I. INTRODUCTION

Petitioner Alan Ricardo Lopez Alvarez respectfully petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241. Petitioner is currently civilly detained by U.S. Immigration and Customs Enforcement (“ICE”) at the South Texas Detention Facility in Pearsall, Texas, despite having no convictions, posing no danger to the community, and presenting no flight risk.

Petitioner has resided continuously in the United States since November 2006, when he entered without inspection. He is the husband of a United States citizen and the father of three United States citizen children, currently 6, 9, and 12 years old. Petitioner is actively pursuing Cancellation of Removal for Certain Non-Permanent Residents under INA § 240A(b) (“42B relief”), a form of relief that requires continued presence in the United States and adjudication before the Immigration Court.

Despite the civil nature of immigration detention, Petitioner's strong family ties, and substantial equities, ICE continues to detain him without a constitutionally adequate custody determination. His continued detention is arbitrary, unlawful, and violates the Due Process Clause of the Fifth Amendment.

Petitioner seeks immediate release from ICE custody, or, in the alternative, a prompt and constitutionally adequate custody hearing.

II. JURISDICTION & VENUE

1. This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner is in custody under the authority of the United States in violation of the Constitution and laws of the United States.
2. Jurisdiction is also proper under 28 U.S.C. § 1331 and 28 U.S.C. §§ 2201–2202.
3. Venue lies in this District pursuant to 28 U.S.C. § 1391(e) and *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484 (1973), because Petitioner is detained within this District and Respondents exercise custody and control over him here.

III. PARTIES

1. Petitioner Alan Ricardo Lopez Alvarez is a noncitizen currently detained by ICE at the South Texas Detention Facility, located at 566 Veterans Drive, Pearsall, Texas 78061.
2. Respondent Miguel Vergara is the ICE Field Office Director responsible for immigration detention operations within this District.
3. Respondent Warden of the South Texas Detention Facility is Petitioner's immediate custodian.

IV. FACTUAL BACKGROUND

1. Petitioner Alan Ricardo Lopez Alvarez entered the United States without inspection in or around November 2006 and has continuously resided in this country for nearly two decades.

2. Petitioner is married to a United States citizen and is the father of three United States citizen children, currently 6, 9, and 12 years old. His family depends on him emotionally, financially, and physically for care and stability.
3. Petitioner has never been convicted of any offense in the United States or elsewhere.
4. Petitioner is currently detained by ICE at the South Texas Detention Facility in Pearsall, Texas, pending removal proceedings.
5. Petitioner is pursuing Cancellation of Removal for Certain Non-Permanent Residents under INA § 240A(b). He has demonstrated continuous physical presence, good moral character, and exceptional and extremely unusual hardship to his United States citizen spouse and children.
6. Despite the absence of any individualized finding that Petitioner poses a danger or flight risk, ICE continues to detain him without a constitutionally adequate custody determination.

V. STATUTORY AND CONSTITUTIONAL FRAMEWORK

Federal district courts have jurisdiction under 28 U.S.C. § 2241 to review whether a noncitizen is “in custody in violation of the Constitution or laws or treaties of the United States.” *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). Habeas jurisdiction extends to challenges to the **fact, duration, or legality of immigration detention**, including constitutional claims. *INS v. St. Cyr*, 533 U.S. 289, 290, 301 (2001).

Where, as here, a petitioner alleges that continued detention violates due process because it is arbitrary, punitive, or unsupported by any individualized findings, habeas jurisdiction is proper.

VI. ARGUMENT

A. Civil Immigration Detention Is Subject to Constitutional Due Process Limits

Immigration detention is civil, not criminal. As such, it is constitutionally permissible only if it serves a legitimate regulatory purpose and is accompanied by adequate procedural protections. *Zadvydas*, 533 U.S. at 690; *Demore v. Kim*, 538 U.S. 510, 527–28 (2003).

The Supreme Court has repeatedly emphasized that civil detention may not be imposed as punishment and may not continue where it becomes excessive in relation to its regulatory purpose. *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992); *Salerno*, 481 U.S. at 747.

Even when Congress authorizes detention, “the Due Process Clause applies to all “persons” within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693.

B. Petitioner’s Continued Detention Violates Substantive Due Process

Substantive due process forbids arbitrary civil detention that is not reasonably related to a legitimate governmental objective. *Zadvydas*, 533 U.S. at 690. The only permissible purposes of immigration detention are to prevent flight or to protect the community. *Demore*, 538 U.S. at 528. Here, Petitioner’s detention is unsupported by any individualized finding that it serves either purpose:

1. Petitioner has no convictions.
2. He has resided in the United States since 2006.
3. He has strong family and community ties.
4. He is pursuing 42B relief and has every incentive to appear for proceedings.
5. No adjudicator has found him to be a danger or flight risk.

ICE’s continued detention of Petitioner without any showing of necessity bears no reasonable relationship to a legitimate regulatory purpose. Detention under these circumstances is punitive in effect, not regulatory, and therefore violates substantive due process. *Foucha*, 504 U.S. at 80.

C. Petitioner’s Detention Violates Procedural Due Process Because No Meaningful Custody Process Exists

Procedural due process requires meaningful safeguards, including an opportunity to be heard before a neutral decisionmaker. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976).

Petitioner has not received a constitutionally adequate custody determination. No neutral adjudicator has evaluated whether his detention is necessary, and no meaningful process exists for him to challenge his continued detention.

Detention under a system that provides no mechanism to test the legality or necessity of custody violates due process. *Boumediene v. Bush*, 553 U.S. 723, 783 (2008).

D. ICE Lacks Statutory Authority to Detain Petitioner Absent Individualized Findings

Civil immigration detention is constitutionally permissible **only when reasonably related to its purpose**—ensuring appearance or protecting the community.

Zadvydas, 533 U.S. at 690.

Here, ICE has made **no individualized determination whatsoever**. Petitioner's detention is therefore **ultra vires**, exceeding statutory authority under § 1226(a).

Courts have repeatedly held that detention under § 1226(a) **without a meaningful custody determination** violates the INA.

See, e.g., Hernandez v. Lynch, 216 F. Supp. 3d 469 (D.N.J. 2016).

E. Release Is the Appropriate Habeas Remedy

Where detention violates the Constitution, release is the appropriate remedy. *Zadvydas*, 533 U.S. at 699. Courts have broad authority under § 2241 to order release from unlawful custody.

Because Petitioner's continued detention violates substantive and procedural due process, this Court should order his immediate release. At a minimum, the Court should require a prompt, constitutionally adequate custody hearing with the burden on DHS.

VII. CLAIMS FOR RELIEF

COUNT I – Unlawful Detention (28 U.S.C. § 2241)

1. Petitioner incorporates all preceding paragraphs.
2. Respondents are detaining Petitioner in violation of the Constitution and laws of the United States.

COUNT II – Declaratory Relief

1. A declaration is warranted that Petitioner's continued detention is unlawful and violates the Due Process Clause of the Fifth Amendment.

VIII. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. **Grant this Petition** for Writ of Habeas Corpus;
2. **Order Respondents to immediately release Petitioner from ICE custody; or**
3. **In the alternative, order a prompt, constitutionally adequate custody hearing with the burden on DHS;**
4. **Declare that Petitioner's continued detention violates the Constitution; and**
5. **Grant any other relief** the Court deems just and proper.

Respectfully submitted,

/s/ Rodolfo Castillo

Rodolfo Castillo

Attorney for Petitioner

Texas Bar No. 24000489

Rudy Castillo Law Firm

2621 Rockgate Dr.

San Antonio, TX 78227

Phone: (210) 777-1111

Email: rc@rudycastillolaw.com

I. SIGNATURE & VERIFICATION

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

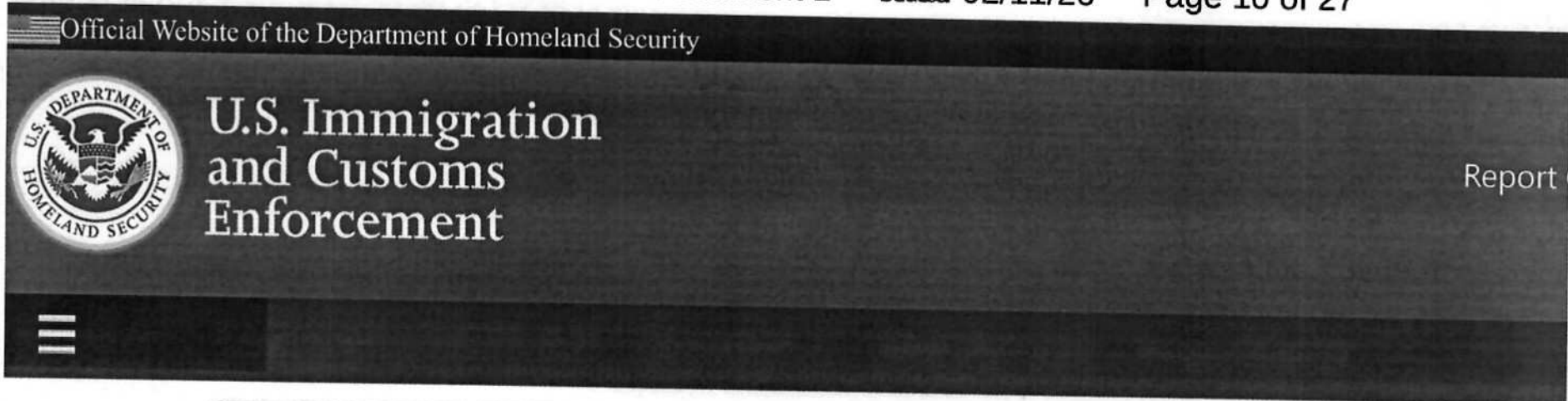
Executed on 02/11/2026

/s/ Rodolfo Castillo
Rodolfo A. Castillo
Attorney for Petitioner

EXHIBITS

1. Exhibit A – ICE Detainee Locator record confirming that Petitioner Alan Ricardo Lopez Alvarez is currently detained at the South Texas Detention Facility in Pearsall, Texas.
2. Exhibit B – Automated Case Information printout reflecting that Petitioner has a scheduled Master Calendar Hearing, maintained in the ordinary course of representation.
3. Exhibit C – Copy of Petitioner Alan Ricardo Lopez Alvarez's identification document.
4. Exhibit D – Copies of United States birth certificates for Petitioner's three United States citizen children, ages 6, 9, and 12.
5. Exhibit E – Copy of Petitioner's marriage certificate evidencing his marriage to a United States citizen, along with a copy of his wife's United States birth certificate.
6. Exhibit F – Attorney Declaration authenticating Exhibits A–E.

EXHIBIT A



[< BACK TO RESULTS](#)

Facility Page

Detention Information For:

ALAN RICARDO LOPEZ ALVAREZ

Country of Birth: Mexico

A-Number: 

Current Detention Facility:

SOUTH TEXAS DETENTION FACILITY
566 VETERANS DRIVE
NA
PEARSALL, TX 78061
Visitor Information: (830) 334-2939

[MORE INFORMATION >](#)



ERO Office Information

[Privacy - Terms](#)

Family members and legal representatives may be able to obtain additional information about this individual's case by contacting this ERO office:

ERO - South Texas, TX Detention Facility
Phone Number: (210) 231-4505

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Related Information

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[Brochure](#)

[ICE ERO Field Offices](#)

[ICE Detention Facilities](#)

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EXHIBIT B



An official website of the United States government

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EOIR | Automated Case Information

Court Closures Today February 11, 2026

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

[Home](#) > **LOPEZ ALVAREZ, ALAN** ()



Automated Case Information

Name: LOPEZ ALVAREZ, ALAN | **A-Number:**  |

Docket Date: 11/7/2025



Next Hearing Information

Your upcoming **MASTER** hearing is on **February 12, 2026** at **8:30 AM**.

JUDGE

Mckee, Robert R.

COURT ADDRESS

566 VETERAN DRIVE., SUITE 101
PEARSALL, TX 78061



Court Decision and Motion Information



This case is pending.



BIA Case Information

No appeal was received for this case.



Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS

566 VETERAN DRIVE., SUITE 101
PEARSALL, TX 78061

PHONE NUMBER

(210) 368-5700

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Department of Justice | Executive Office for Immigration Review
5107 Leesburg Pike, Suite 2600, Falls Church, VA 22041



EOIR | Automated Case Information

EXHIBIT C



Para uso exclusivo de la Secretaría de Relaciones Exteriores para la expedición de pasaportes a personas menores de edad o personas con discapacidad que no estén en posibilidad de manifestar su voluntad.
For the exclusive use of the Ministry of Foreign Affairs for the issuance of passports to minors or people with disabilities who are unable to express their will.

PASAPORTE PASSPORT		ESTADOS UNIDOS MEXICANOS		
Tipo/ Type	Clave del país de expedición/ Issuing state code	Pasaporte No / Passport No		
P	MEX			
Apellidos/ Surname				
				
Nombres/ Given names				
				
Nacionalidad/ Nationality		Fecha de nacimiento/ Date of birth		
				
CURP/ Personal No				
				
Sexo/ Sex	Lugar de nacimiento/ Place of birth			
M				
Fecha de expedición/ Date of issue	Fecha de caducidad/ Expiry date		Observaciones/ Remarks	
				
Firma del Titular/ Holder's Signature	Autoridad/ Authority			
				
				
				

EXHIBIT D

CERTIFICATION OF VITAL RECORD

STATE OF TEXAS

City of San Antonio Office of the City Clerk

STATE OF TEXAS

CERTIFICATE OF BIRTH

1. Child's Name First: [REDACTED] Middle: [REDACTED] Last: [REDACTED] Suffix: [REDACTED]		2. Date of Birth (mm/dd/yyyy) [REDACTED]		3. Sex MALE	
4a. Place of Birth - County BEXAR		4b. City or Town (If outside city limits, give precinct no.) SAN ANTONIO		5. Time of Birth 11:28 AM	
7a. Place of Birth ☐ Clinic / Doctor's Office ☐ Licensed Birthing Center ☒ Hospital ☐ Home Birth (Planned to deliver at home? ☐ Yes ☐ No) ☐ Other (Specify):		7b. Name of Hospital or Birthing Center, NPI (If Not Institution, Give Street Address) SOUTHWEST GENERAL HOSPITAL			
8a. Attendant's Name, NPI, and Mailing Address CHAVEZ, JORGE 343 W. HOUSTON # 205 SAN ANTONIO, TEXAS 78201		9a. Certifier - I certify that this child was born alive at the place and time and on the date as stated. ARANDA, JENNIFER Signature and Title: [REDACTED] Date Signed: [REDACTED]			
8b. ☒ MD ☐ DO ☐ CNM ☐ Midwife ☐ Other (Specify):		9b. ☐ Attendant ☒ Facility Administrator / Designee ☐ Other (Specify):			
10. Mother's Name Prior to First Marriage First: YESENIA Middle: GONZALEZ Last: [REDACTED] Suffix: [REDACTED]		11. Date of Birth (mm/dd/yyyy) [REDACTED]		12. Birthplace (State, Territory or Foreign Country) TEXAS	
13a. Residence - State TEXAS		13b. County BEXAR		13c. City, Town or Location SAN ANTONIO	
13d. Street Address or Rural Location [REDACTED]		13e. Zip Code [REDACTED]			
13f. Inside City Limits ☒ Yes ☐ No		14. Mailing Address: ☒ Same As Residence, or:			
15. Father's Name First: ALAN Middle: RICARDO Last: ALVAREZ Suffix: [REDACTED]		16. Date of Birth (mm/dd/yyyy) [REDACTED]		17. Birthplace (State, Territory or Foreign Country) MEXICO	
18a. Local File Number [REDACTED]		18b. Date Received by Local Registrar [REDACTED]		18c. Signature of Local Registrar Tina J. Flores	

WARNING: THE PENALTY FOR KNOWINGLY MAKING A FALSE STATEMENT IN THIS FORM CAN BE 2-10 YEARS IN PRISON AND A FINE OF UP TO \$5,000.

CA11002

DATE ISSUED: [REDACTED]

This is to certify that this is a true and correct reproduction of the original record as recorded in this office.
Issued under authority of Sec. 191.051, Health and Safety Code.

Issued:

Tina J. Flores

Tina J. Flores
Local Registrar

CERTIFICATION OF VITAL RECORD

STATE OF TEXAS

City of San Antonio
Office of the City Clerk

STATE OF TEXAS

CERTIFICATE OF BIRTH

1. Child's Name		First	Middle	Last	Suffix	2. Date of Birth (mm/dd/yyyy)	3. Sex
							MALE
4a. Place of Birth - County		4b. City or Town (If outside city limits, give precinct no.)		5. Time of Birth		6a. Plurality - Single, Twin, Triplet, etc.	6b. If Plural Birth, Born 1st, 2nd, 3rd, etc.
BEXAR		SAN ANTONIO		08:29 AM		SINGLE	
7a. Place of Birth ☐ Clinic / Doctor's Office ☐ Licensed Birthing Center ☒ Hospital ☐ Home Birth (Planned to deliver at home? ☐ Yes ☐ No) ☐ Other (Specify):				7b. Name of Hospital or Birthing Center, NPI (If Not Institution, Give Street Address)			
				SOUTHWEST GENERAL HOSPITAL			
8a. Attendant's Name, NPI, and Mailing Address				9a. Certifier - I certify that this child was born alive at the place and time and on the date as stated.			
CHAVEZ, JORGE 343 W. HOUSTON # 206 SAN ANTONIO, TEXAS 78201				ARANDA, JENNIFER Signature and Title Date Signed			
8b. ☒ MD ☐ DO ☐ CNM ☐ Midwife ☐ Other (Specify):				9b. ☐ Attendant ☒ Facility Administrator / Designee ☐ Other (Specify):			
10. Mother's Name Prior to First Marriage		First	Middle	Last	11. Date of Birth (mm/dd/yyyy)		
YESENIA			GONZALEZ				
13a. Residence - State		13b. County		13c. City, Town or Location		12. Birthplace (State, Territory or Foreign Country)	
TEXAS		BEXAR		SAN ANTONIO		TEXAS	
13e. Zip Code		13f. Inside City Limits		14. Mailing Address:		13d. Street Address or Rural Location	
		☒ Yes ☐ No		☒ Same As Residence, or:			
15. Father's Name Prior to First Marriage		First	Middle	Last	Suffix	16. Date of Birth (mm/dd/yyyy)	
ALAN		RICARDO		LOPEZ-ALVAREZ			
18a. Local File Number		18b. Date Received by Local Registrar		17. Birthplace (State, Territory or Foreign Country)			
				MEXICO			
				18c. Signature of Local Registrar			
				Tina J. Flores			

WARNING: THE PENALTY FOR KNOWINGLY MAKING A FALSE STATEMENT IN THIS FORM CAN BE 2-10 YEARS IN PRISON AND A FINE OF UP TO \$5,000.

CA11002

DATE ISSUED:



This is to certify that this is a true and correct reproduction of the original record as recorded in this office.
Issued under authority of Sec. 191.051, Health and Safety Code.

Issued:



Tina J. Flores
Local Registrar



CERTIFICATION OF VITAL RECORD

CITY OF SAN ANTONIO

STATE OF TEXAS

CERTIFICATE OF BIRTH

BIRTH NUMBER

1. Child's Name		First	Middle	Last	Suffix	2. Date of Birth (mm/dd/yyyy)	3. Sex
				ALVAREZ			FEMALE
4a. Place of Birth - County		4b. City or Town (If outside city limits, give precinct no.)		5. Time of Birth		6a. Plurality - Single, Twin, Triplet, etc.	6b. If Plural Birth, Born 1st, 2nd, 3rd, etc.
BEXAR		SAN ANTONIO		05:15 PM		SINGLE	
7a. Place of Birth ☐ Clinic/Doctor's Office ☐ Licensed Birthing Center ☒ Hospital ☐ Home Birth ☐ Other (Specify):				7b. Name of Hospital or Birthing Center, NPI (If Not Institution, Give Street Address)			
				SOUTHWEST GENERAL HOSPITAL			
8a. Attendant's Name, NPI, and Mailing Address				9a. Certifier - I certify that this child was born alive at the place and time and on the date as stated.			
LYDIA APPIAH-DWAMENA 7430 BARLITE SAN ANTONIO, TEXAS 78224				JENNIFER ARANDA Signature and Title Date Signed			
8b. ☒ MD ☐ DO ☐ CNM ☐ Midwife ☐ Other (Specify):				9b. ☐ Attendant ☒ Facility Administrator / Designee ☐ Other (Specify):			
10. Mother's Name Prior to First Marriage		First	Middle	Last	Suffix	11. Date of Birth (mm/dd/yyyy)	12. Birthplace (State, Territory or Foreign Country)
YESENIA				GONZALEZ			TEXAS
13a. Residence - State		13b. County		13c. City, Town or Location		13d. Street Address or Rural Location	
TEXAS		BEXAR		SAN ANTONIO			
13e. Zip Code		13f. Inside City Limits		14. Mailing Address: ☒ Same As Residence, or: (If Same As Residence, Enter Zip Code Only)			
		☒ Yes ☐ No					
15. Father's Name Prior to First Marriage		First	Middle	Last	Suffix	16. Date of Birth (mm/dd/yyyy)	17. Birthplace (State, Territory or Foreign Country)
ALAN		RICARDO		LOPEZ-ALVAREZ			MEXICO
18a. Local File Number		18b. Date Received By Local Registrar		18c. Signature of Local Registrar			
				James L. Wilson			

VS-111.3 REV. 01/05 WARNING: THE PENALTY FOR KNOWINGLY MAKING A FALSE STATEMENT IN THIS FORM CAN BE 2-10 YEARS IN PRISON AND A FINE OF UP TO \$5,000.

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ISSUED

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James L. Wilson
Local Registrar



EXHIBIT E

The State of Texas

County of Bexar

No.

To Any Person Authorized by the Laws of the State of Texas
To Celebrate the Rites of Matrimony in the State of Texas
You Are hereby authorized to Celebrate the Rites of Matrimony by joining in the

Holy Union of Matrimony

ALAN RICARDO LOPEZ ALVAREZ and YESENIA GONZALEZ



in accordance with the Laws of this State and that you make
due return of this, your authority, to my office, within ninety
days after the celebration aforesaid, certifying how you have
executed the same.

Given under my hand and the seal of the County Court of Bexar
County, Texas, this 4 day of October, 20 17

By Gerard Rickhoff, County Clerk
Joyce Mendoza, Deputy

The foregoing License executed by joining the within named parties in the

Holy Union of Matrimony

this the 4 day of Oct, 20 17

Two Witnesses sign here

Returned and Recorded this the 4

COUNTY CLERK, BEXAR COUNTY, TEXAS

Official Performing Ceremony

Signature

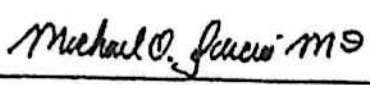
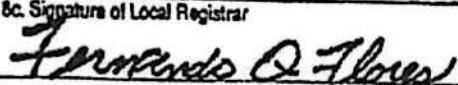
Print Name/Title/County

By John Doyle

DEPUTY

CERTIFICATION OF VITAL RECORD

CITY OF SAN ANTONIO

STATE OF TEXAS		CERTIFICATE OF BIRTH		BIRTH NUMBER	
1. Name First Middle Last		2. Date of Birth		3. Sex	
YESENIA GONZALEZ		[REDACTED]		Female	
4a. Place of Birth - County		4b. City or Town (If outside city limits, give precinct no.)		5. Time of Birth	
Bexar		San Antonio		09:08 a.m.	
6a. Plurality - Single, Twin, Triplet, etc.		6b. If Plural Birth, Born 1st, 2nd, 3rd, etc.			
Single					
7a. Place of Birth ☐ Clinic / Doctor's Office ☐ Licensed Birthing Center ☒ Hospital		7b. Name of Hospital or Birthing Center (If Not Institution, Give Street Address)			
☐ Residence ☐ Other (Specify):		Baptist Medical Center			
8a. Attendant's Name and Mailing Address		9a. Certifier - I certify that this child was born alive at the place and time and on the date as stated.			
GARCIA, MICHAEL 215 E QUINCY SUITE 505 SAN ANTONIO, TEXAS 78215		 Signature and Title			
8b. ☒ MD ☐ DO ☐ CNM ☐ Midwife ☐ Other (Specify):		9b. ☒ Attendant ☐ Facility Administrator / Designee ☐ Other (Specify):			
10. Name First Middle Maiden Surname		11. Date of Birth		12. Birthplace (State or Foreign Country)	
ROSA MARIA HERNANDEZ		[REDACTED]		Mexico	
13a. Residence - State		13b. County		13c. City or Town	
TEXAS		BEXAR		SAN ANTONIO	
13d. Street Address or Rural Location		[REDACTED]			
13e. Inside City Limits ☒ Yes ☐ No		14. Mother's Mailing Address (If Same As Residence, Enter Zip Code Only)			
[REDACTED]		[REDACTED]			
15. Name First Middle Last		16. Date of Birth		17. Birthplace (State or Foreign Country)	
JOE GUADALUPE GONZALEZ		[REDACTED]		Mexico	
18a. Registrar's File Number		18b. Date Received by Local Registrar		18c. Signature of Local Registrar	
[REDACTED]		[REDACTED]			

DATE ISSUED: [REDACTED]

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James L. Wilson
Local Registrar



EXHIBIT F

**ATTORNEY DECLARATION IN SUPPORT OF PETITION FOR WRIT OF HABEAS
CORPUS**

I, **Rodolfo Castillo**, declare as follows:

1. I am an attorney licensed to practice law and represent Petitioner **Alan Ricardo Lopez Alvarez** in the above-captioned matter.
2. Petitioner **Alan Ricardo Lopez Alvarez** is currently detained by U.S. Immigration and Customs Enforcement at the **South Texas Detention Facility**, located at **566 Veterans Drive, Pearsall, Texas 78061**.
3. The document attached as **Exhibit A** is a true and correct copy of the ICE Detainee Locator record confirming that Petitioner **Alan Ricardo Lopez Alvarez** is currently detained at the South Texas Detention Facility in Pearsall, Texas.
4. The document attached as **Exhibit B** is a true and correct copy of the Automated Case Information printout reflecting that Petitioner has a scheduled Master Calendar Hearing, maintained in the ordinary course of representation.
5. The document attached as **Exhibit C** is a true and correct copy of Petitioner **Alan Ricardo Lopez Alvarez's** identification document, maintained in the ordinary course of representation.
6. The documents attached as **Exhibit D** are true and correct copies of United States birth certificates for Petitioner's three United States citizen children, **ages 6, 9, and 12**, maintained in the ordinary course of representation.
7. The documents attached as **Exhibit E** are true and correct copies of Petitioner's marriage certificate evidencing his marriage to a United States citizen, along with a copy of his wife's United States birth certificate, maintained in the ordinary course of representation.
8. All documents referenced herein are kept and maintained in the ordinary course of my legal practice.

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

Executed on February 11, 2026, at San Antonio, Texas.

/s/ Rodolfo Castillo
Rodolfo A. Castillo
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this February 11, 2026, I electronically filed the foregoing Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 with the Clerk of the United States District Court for the Western District of Texas, San Antonio Division, using the CM/ECF system which automatically serves counsel for the Respondents.

In addition, a copy of this Petition was served by U.S. Mail upon:

Warden, South Texas Detention Complex
566 Veterans Dr.
Pearsall, TX 78061

and

The Honorable Pam Bondi
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

and

U.S. Attorney's Office
Western District of Texas – San Antonio Division
601 N.W. Loop 410, Suite 600
San Antonio, TX 78216

Respectfully submitted,

/s/ Rodolfo Castillo
Rodolfo Castillo
Attorney for Petitioner
Texas Bar No. 24000489
Rudy Castillo Law Firm
2621 Rockgate Dr.
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