

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MAR 30 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY

RONAL MIGUEL REYES BLAZQUEZ,

(A# )

Petitioner,

v. Case No. 1:26-cv-00329-DAE

KRISTI NOEM, Secretary, Department of
Homeland Security, et al.,

Respondents.

PETITIONER'S EMERGENCY MOTION FOR TEMPORARY
RESTRAINING ORDER
AND PRELIMINARY INJUNCTION TO PREVENT REMOVAL

I. INTRODUCTION

1. Petitioner RONAL MIGUEL REYES BLAZQUEZ ("Petitioner"), Pro Se, respectfully files this Emergency Motion for Temporary Restraining Order and Preliminary Injunction to Prevent Removal. Petitioner is a 23-year-old Cuban national who was lawfully admitted to the United States through the Cuban Humanitarian Parole program on April 16, 2024, and who timely filed an Application to Register Permanent Residence or Adjust Status (Form I-485) under the Cuban Adjustment Act of 1966, Pub. L. No. 89-732, 80 Stat. 1161, on October 23, 2025. Despite having done everything required of him under the law, Petitioner now faces imminent deportation to Cuba as a direct consequence of the federal government's own internal policy decisions—not due to any fault, failure, or deficiency on the part of Petitioner.

2. On March 10, 2026, Immigration Judge Eric J. Tijerina of the Pearsall Immigration Court ordered Petitioner removed to Cuba. The removal order was issued **solely** because the United States Citizenship and Immigration Services ("USCIS") placed Petitioner's pending I-485 application on a "permanent hold" pursuant to Policy Memoranda PM-602-0192 (issued December 2, 2025) and PM-602-0194 (issued January 1, 2026). These policy memoranda paused all benefit adjudications for nationals of Cuba and dozens of other countries, thereby

making it structurally impossible for USCIS to process Petitioner's adjustment application. When the Department of Homeland Security's own counsel informed the Immigration Judge that the I-485 was on "permanent hold," the Judge deemed the application "abandoned" and ordered removal—notwithstanding that the abandonment was caused entirely by the government's own policy, not by any act or omission of Petitioner.

3. Petitioner faces imminent, irreparable harm. Deportation to Cuba would permanently and irrevocably destroy his statutory right to adjust status under the Cuban Adjustment Act, a right that Congress has not repealed and that Petitioner has fully and properly invoked. This Court should issue a Temporary Restraining Order and Preliminary Injunction immediately restraining Respondents from removing, deporting, or transferring Petitioner from the United States pending the resolution of his habeas corpus petition, Case No. 1:26-cv-00329-DAE.

II. PROCEDURAL BACKGROUND

4. Petitioner filed his Petition for Writ of Habeas Corpus in this Court in February 2026, invoking this Court's jurisdiction under 28 U.S.C. § 2241 to challenge his prolonged and unlawful detention at the T. Don Hutto Residential Center in Taylor, Texas. The case was assigned Case No. 1:26-cv-00329-DAE.

5. Respondents filed their Response to the Petition on February 17, 2026 (ECF No. 4), opposing Petitioner's request for habeas relief.

6. Petitioner filed his Traverse (Reply) on approximately March 2, 2026, responding to Respondents' arguments and reasserting his entitlement to relief under the Due Process Clause, the Cuban Adjustment Act, and applicable federal law.

7. On March 10, 2026, while the habeas petition remained pending before this Court, Immigration Judge Eric J. Tijerina deemed Petitioner's I-485 claim "abandoned" and entered an order of removal to Cuba. The removal order was premised entirely on USCIS's inability to adjudicate the I-485—an inability caused by the government's own policy hold, not by any failure of Petitioner.

8. On March 19, 2026, Petitioner filed a timely appeal to the Board of Immigration Appeals ("BIA") via certified mail to both the BIA in Falls Church, Virginia, and the Immigration Court in Pearsall, Texas. The appeal deadline is April 9, 2026. The appeal remains pending.

9. Petitioner now faces imminent deportation to Cuba. Given the pendency of his BIA appeal, the unresolved habeas petition before this Court, and the irreversible nature of removal, Petitioner urgently seeks emergency injunctive relief to maintain the status quo pending judicial review.

III. FACTUAL BACKGROUND

A. Lawful Entry and Compliance with Immigration Law

10. Petitioner is a native and citizen of Cuba, born on [REDACTED]. He is 23 years old. He holds Cuban Passport No. [REDACTED].

11. On April 16, 2024, Petitioner was lawfully admitted to the United States at Miami, Florida, pursuant to the Cuban Humanitarian Parole ("CHP") program. He was inspected, admitted, and paroled by a Customs and Border Protection officer (Officer No. 1178) at the Miami port of entry. His I-94 Arrival/Departure Record, Number [REDACTED] reflects his admission class as "CHP" (Cuban Humanitarian Parole), with parole valid until April 15, 2026.

12. Upon his arrival, Petitioner complied with all requirements of his parole. He completed biometrics at the USCIS Austin Field Office (11301 Lakeline Blvd.) on June 4, 2024. He was granted an Employment Authorization Document ("EAD"), Category C11 (Parolee), Card No. [REDACTED] valid through April 15, 2026. He obtained a valid Texas Driver License, [REDACTED], Class C, also valid through April 15, 2026.

13. Petitioner resided lawfully in Austin, Texas, initially at [REDACTED], and subsequently at [REDACTED]. [REDACTED] He maintained lawful employment pursuant to his EAD and conducted himself as a law-abiding member of the community.

B. I-485 Application Under the Cuban Adjustment Act

14. On October 23, 2025, Petitioner filed his Application to Register Permanent Residence or Adjust Status (Form I-485) with USCIS under the Cuban Adjustment Act of 1966 ("CAA"), Pub. L. No. 89-732, 80 Stat. 1161, codified at 8 U.S.C. § 1255 note. The application was assigned Receipt Number



Petitioner paid the required filing fee of \$1,440.00.

15. The Cuban Adjustment Act provides that any native or citizen of Cuba who has been inspected and admitted or paroled into the United States and who has been physically present in the United States for at least one year may apply for adjustment of status to that of a lawful permanent resident. Petitioner meets every statutory requirement: he is a Cuban citizen; he was paroled into the United States on April 16, 2024; he had been physically present for over one year at the time of filing; and he filed a complete I-485 application with the requisite fee. The Cuban Adjustment Act has not been repealed and remains in full force and effect.

C. Arrest and Prolonged Detention

16. Petitioner was arrested by Immigration and Customs Enforcement ("ICE") agents at a gas station in Austin, Texas. The stated basis for the encounter was

an expired driver's license—a civil traffic infraction under Texas law, *not* a criminal offense. Petitioner was not arrested, charged, or convicted of any criminal offense in connection with this encounter or at any other time.

17. Petitioner has **no criminal record whatsoever**. He has never been arrested for, charged with, or convicted of any crime in the United States or abroad. He poses no danger to the community and no risk of flight.

18. Since approximately August 2025, Petitioner has been detained at the T. Don Hutto Residential Center, 1001 Welch Street, Taylor, Texas 76574—a period of more than eight months as of the date of this filing. He was never in removal proceedings prior to his arrest. His detention has been continuous and without an individualized bond hearing.

D. Immigration Court Proceedings

19. Petitioner's removal proceedings were conducted before Immigration Judge Eric J. Tijerina at the Pearsall Immigration Court. Between August 2025 and March 2026, the Immigration Judge held multiple hearings on the following dates: August 13, September 23, October 14, October 28, November 18, December 2, December 16, 2025; and January 9, January 29, February 12, February 24, and March 10, 2026.

20. Throughout these proceedings, the Immigration Judge granted multiple continuances to allow USCIS time to adjudicate Petitioner's pending I-485 application. However, DHS counsel repeatedly informed the Court that the I-485 adjudication was on a "permanent hold" pursuant to USCIS policy, and that USCIS could not and would not process the application.

21. On February 24, 2026, the Immigration Judge warned that if no I-485 approval was obtained by March 10, 2026, the Court would deem the adjustment claim abandoned. This deadline was imposed despite the fact that it was structurally impossible for Petitioner—or anyone—to obtain an I-485 approval, because USCIS's own policy prohibited the adjudication.

22. On March 10, 2026, as warned, Judge Tijerina deemed Petitioner's adjustment of status claim "abandoned" and ordered Petitioner removed to Cuba. Petitioner reserved his right to appeal. Petitioner timely filed his appeal to the Board of Immigration Appeals on March 19, 2026, with the appeal deadline of April 9, 2026.

IV. THE USCIS HOLD CREATED AN IMPOSSIBLE CATCH-22

23. On December 2, 2025, USCIS issued Policy Memorandum PM-602-0192, which paused all benefit adjudications for nationals of nineteen (19) countries designated as "high-risk," including Cuba. This policy memorandum imposed a

blanket hold on the processing of all pending applications—including I-485 applications for adjustment of status—filed by nationals of the affected countries.

24. On January 1, 2026, USCIS issued Policy Memorandum PM-602-0194, which expanded the hold to nationals of thirty-nine (39) countries. Cuba remained on the list. The policy memorandum stated that the "hold remains in place until affirmatively lifted or modified by USCIS leadership." As of the date of this filing, the hold has not been lifted.

25. These policy memoranda have created an impossible Catch-22 for Petitioner and similarly situated Cuban nationals. Petitioner filed his I-485 application on October 23, 2025—*before* either policy memorandum was issued. He paid the full filing fee of \$1,440.00. He completed his biometrics. He attended every hearing. He cooperated fully with every aspect of the immigration process. He did *everything* required of him under the law.

26. Despite Petitioner's full compliance, USCIS *cannot* adjudicate his I-485 application because of its *own* internal policy. Simultaneously, the Executive Office for Immigration Review ("EOIR")—another arm of the same federal government—ordered Petitioner removed to Cuba *because* his I-485 had not been approved. One arm of the government blocks the application from being processed, while another arm of the government deports the applicant for not having an approved application. This is a textbook Catch-22—a trap of the

government's own making from which Petitioner has no escape absent judicial intervention.

27. Petitioner bears **no responsibility whatsoever** for the failure of USCIS to adjudicate his I-485. The delay and the resulting removal order are entirely products of the government's own policy choices. To permit Petitioner's deportation under these circumstances would be to punish him for the government's own actions—a result that violates fundamental principles of due process, fairness, and the rule of law.

V. LEGAL STANDARD FOR TEMPORARY RESTRAINING ORDER

28. A temporary restraining order is an extraordinary remedy that is warranted when the movant demonstrates: (1) a substantial likelihood of success on the merits; (2) a substantial threat of irreparable harm if the injunction is not granted; (3) that the threatened injury to the movant outweighs any damage the injunction may cause the opposing party; and (4) that the injunction will not disserve the public interest. *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008); *Nken v. Holder*, 556 U.S. 418, 434 (2009).

29. In the Fifth Circuit, courts apply the same four-factor test for both temporary restraining orders and preliminary injunctions. *Janvey v. Alguire*, 647 F.3d 585, 595 (5th Cir. 2011). The purpose of such relief is to preserve the status quo and prevent irreparable injury pending resolution of the merits. *Canal Auth. of State of*

Fla. v. Callaway, 489 F.2d 567, 572 (5th Cir. 1974). The movant need not prove his case in full; rather, he must present a *prima facie* case demonstrating a substantial likelihood of success. *Id.*

VI. APPLICATION OF THE STANDARD

A. Petitioner Has a Substantial Likelihood of Success on the Merits

30. Petitioner is substantially likely to succeed on the merits of his habeas petition for multiple independent reasons.

31. First, Petitioner's removal order is the product of a government-created Catch-22 that violates the Due Process Clause of the Fifth Amendment. The Supreme Court has long recognized that the Due Process Clause applies to all persons within the United States, including noncitizens. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001) ("[O]nce an alien enters the country, the legal circumstance changes, for the Due Process Clause applies to all 'persons' within the United States"). Petitioner was lawfully paroled into the United States and is entitled to the protections of the Due Process Clause, including the right not to be deported based on a procedural impossibility created by the government itself.

32. Second, Petitioner was lawfully paroled into the United States and maintains a statutory right to adjust status under the Cuban Adjustment Act. The CAA

specifically provides that Cuban nationals who have been "inspected and admitted or paroled" into the United States may apply for adjustment of status. 8 U.S.C. § 1255 note. Petitioner was paroled—not simply released on bond or otherwise present without admission. His parole status entitles him to the full protections of the CAA, and the government may not extinguish that statutory right through its own internal policy choices.

33. Third, Petitioner has been detained for over eight months without an individualized bond hearing, in violation of his due process rights. See *Zadvydas*, 533 U.S. at 701 (recognizing due process limits on immigration detention); *Demore v. Kim*, 538 U.S. 510, 532 (2003) (Kennedy, J., concurring) ("[A] lawful permanent resident alien ... could be entitled to an individualized determination as to his risk of flight and dangerousness if the continued detention became unreasonable or unjustified"). Petitioner has no criminal record, poses no danger to the community, and poses no flight risk. His prolonged detention without a bond hearing is constitutionally unreasonable.

34. Fourth, the Immigration Judge's conclusion that Petitioner's I-485 was "abandoned" is legally erroneous. An application cannot be deemed abandoned when the sole reason for its non-adjudication is the government's own affirmative policy prohibiting adjudication. Petitioner took every step within his power: he filed the application, paid the fee, completed biometrics, and appeared at every

hearing. The government cannot place an application on "permanent hold" and then penalize the applicant for the hold's consequences.

B. Petitioner Will Suffer Irreparable Harm Absent Injunctive Relief

35. Deportation to Cuba would constitute irreparable harm of the most severe kind. Removal from the United States is, by its very nature, an irreversible act. Once deported, Petitioner will permanently and irrevocably lose his right to adjust status under the Cuban Adjustment Act. There is no mechanism by which a deported Cuban national can invoke the CAA from abroad. The statutory right that Congress granted—and that Petitioner properly invoked—will be destroyed.

36. The Supreme Court and the Fifth Circuit have repeatedly recognized that the loss of constitutional and statutory rights constitutes irreparable harm per se. See *Elrod v. Burns*, 427 U.S. 347, 373 (1976) ("The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury."); *Nken v. Holder*, 556 U.S. 418, 435 (2009) (recognizing that removal to a country where a noncitizen may face persecution constitutes irreparable harm). The permanent destruction of Petitioner's statutory right to adjust status under the CAA—a right created by an Act of Congress—constitutes precisely the kind of irreparable harm that injunctive relief is designed to prevent.

37. Moreover, the harm to Petitioner cannot be remedied after the fact. If Petitioner is deported and this Court or the BIA subsequently determines that his removal was erroneous, there is no guarantee that he could return to the United States to pursue his adjustment application. The harm is permanent, irreversible, and imminent. Only this Court's immediate intervention can prevent it.

C. The Balance of Equities Tips Decidedly in Petitioner's Favor

38. The balance of equities weighs overwhelmingly in Petitioner's favor. On one side, Petitioner faces the permanent loss of his liberty, his statutory right to adjust status under the Cuban Adjustment Act, and his life in the United States. On the other side, the government suffers no cognizable harm from maintaining the status quo.

39. Petitioner is already detained at T. Don Hutto. He is not at large in the community. He poses no flight risk—he is physically in the government's custody. He poses no danger to the community—he has no criminal record of any kind. Granting a temporary restraining order would simply maintain the status quo: Petitioner remains detained while this Court and the BIA resolve the significant legal questions presented by his case.

40. The government, by contrast, has no legitimate interest in rushing to deport a lawfully paroled individual whose removal order resulted entirely from the

government's own internal policy hold. The government's interest in enforcing immigration law is not served by deporting individuals who have fully complied with the law and whose removal is the product of the government's own administrative Catch-22.

D. The Public Interest Favors Injunctive Relief

41. The public interest strongly favors the issuance of injunctive relief. "[I]t is always in the public interest to prevent the violation of a party's constitutional rights." *Jackson Women's Health Org. v. Currier*, 760 F.3d 448, 458 n.9 (5th Cir. 2014) (quoting *Awad v. Ziriax*, 670 F.3d 1111, 1132 (10th Cir. 2012)). The public has a paramount interest in ensuring that the government does not deport individuals through procedural traps of its own making.

42. The public interest also favors the enforcement of duly enacted federal statutes, including the Cuban Adjustment Act. Congress has determined that Cuban nationals who meet the statutory criteria are entitled to adjust their status. The public interest is served when agencies faithfully implement the laws Congress has enacted—not when agencies adopt internal policies that functionally nullify those laws while simultaneously penalizing individuals who relied on them.

43. Finally, the public interest favors preventing erroneous deportation. See *Nken*, 556 U.S. at 436 ("[T]here is a public interest in preventing aliens from being wrongfully removed, particularly to countries where they are likely to face substantial harm."). Petitioner's removal order is the product of a governmental Catch-22; permitting his deportation under these circumstances would undermine public confidence in the fairness and integrity of the immigration system.

VII. PRAYER FOR RELIEF

WHEREFORE, Petitioner RONAL MIGUEL REYES BLAZQUEZ, Pro Se, respectfully requests that this Honorable Court:

1. Issue a Temporary Restraining Order *immediately* restraining Respondents KRISTI NOEM, Secretary of the Department of Homeland Security; TODD LYONS, Acting Director of U.S. Immigration and Customs Enforcement; HENRY LUCERO, Acting Director of Enforcement and Removal Operations; the FIELD DIRECTOR of the San Antonio ICE Field Office; the WARDEN of T. Don Hutto Residential Center; the ATTORNEY GENERAL OF THE UNITED STATES; and all their officers, agents, servants, employees, and persons acting in concert or participation with them, from removing, deporting, or transferring Petitioner RONAL MIGUEL REYES BLAZQUEZ from the United States;

2. Issue a Preliminary Injunction maintaining the status quo and prohibiting Respondents from removing, deporting, or transferring Petitioner pending the full and final resolution of this habeas corpus petition;

3. Order Respondents to show cause why a preliminary injunction should not be issued;

4. Order expedited briefing on the merits of the habeas corpus petition;

5. Grant such other and further relief as this Court deems just, equitable, and proper.

Respectfully submitted,

Date: 03/20/2026

Ronal Miguel Reyes Blazquez

RONAL MIGUEL REYES BLAZQUEZ

Petitioner, Pro Se

A#



T. Don Hutto Detention Center

1001 Welch Street

Taylor, TX 76574

CERTIFICATE OF SERVICE

I hereby certify that on this 25 day of March, 2026, a true and correct copy of the foregoing Petitioner's Emergency Motion for Temporary Restraining Order and Preliminary Injunction to Prevent Removal was served upon counsel for Respondents via the Court's CM/ECF electronic filing system and/or via first-class United States mail, postage prepaid, to:

Tasha May
Special Assistant United States Attorney
601 N.W. Loop 410, Suite 600
San Antonio, Texas 78216

Ronal Miguel Reyes Blazquez

RONAL MIGUEL REYES BLAZQUEZ

Petitioner, Pro Se
T. Don Hutto Detention Center
1001 Welch Street
Taylor, TX 76574

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

RONAL MIGUEL REYES BLAZQUEZ,

(A# )

Petitioner,

v. Case No. 1:26-cv-00329-DAE

KRISTI NOEM, Secretary, Department of
Homeland Security, et al.,

Respondents.

**MEMORANDUM OF LAW IN SUPPORT OF PETITIONER'S
EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

TABLE OF CONTENTS

TABLE OF AUTHORITIES	ii
I. PRELIMINARY STATEMENT	
1	
II. STATEMENT OF FACTS	3
III. ARGUMENT	6
A. The Government Created an Unconstitutional Catch-22 That Violates Due Process ... 6	
B. Petitioner Was Lawfully Paroled and Has a Statutory Right Under the Cuban Adjustment Act ... 9	
C. Petitioner's Prolonged Detention Violates the Fifth Amendment	12
D	
E. The Four-Factor Test for Injunctive Relief Is Met	15
IV. CONCLUSION	17
CERTIFICATE OF SERVICE	
18	

TABLE OF AUTHORITIES

Cases

Buenrostro-Mendez v. Bondi, 2026 WL 323330 (5th Cir. 2026) 9, 10

Demore v. Kim, 538 U.S. 510 (2003) 12, 13

Elrod v. Burns, 427 U.S. 347 (1976) 15, 16

Hamdi v. Rumsfeld, 542 U.S. 507 (2004) 14

INS v. Chadha, 462 U.S. 919 (1983) 10, 11

Mathews v. Eldridge, 424 U.S. 319 (1976) 7, 8

Nken v. Holder, 556 U.S. 418 (2009) 16, 17

Reno v. Flores, 507 U.S. 292 (1993) 13, 14

Winter v. Natural Resources Defense Council, 555 U.S. 7 (2008) 15

Youngstown Sheet & Tube Co. v. Sawyer, 343 U.S. 579 (1952) 11

Zadvydas v. Davis, 533 U.S. 678 (2001) 7, 8, 12, 13

Statutes and Constitutional Provisions

U.S. Const. amend. V 12, 13, 14

Cuban Adjustment Act of 1966, Pub. L. No. 89-732, 80 Stat. 1161 9, 10, 11

Immigration and Nationality Act § 212(d)(5)(A), 8 U.S.C. § 1182(d)(5)(A) 9

8 U.S.C. § 1255 note (Cuban Adjustment Act) 9, 10

28 U.S.C. § 1651 (All Writs Act) 14

28 U.S.C. § 2241 (Habeas Corpus) 14

8 C.F.R. § 1003.31(h) 8

Other Authorities

USCIS Policy Memorandum PM-602-0192 (Dec. 2, 2025) 3, 6, 7, 11

USCIS Policy Memorandum PM-602-0194 (Jan. 1, 2026) 3, 6, 7, 11

I. PRELIMINARY STATEMENT

This case presents a fundamental question about the limits of executive power and the constitutional guarantee of due process: May the United States government invite an individual into this country through its own official humanitarian parole program, accept his application for lawful permanent residence under a statute enacted by Congress, and then deport him solely because a different arm of the same government has imposed an indefinite administrative hold that prevents his application from ever being adjudicated?

The answer, under the Due Process Clause of the Fifth Amendment, is no.

Petitioner Ronal Miguel Reyes Blazquez is a twenty-three-year-old Cuban national who entered the United States on April 16, 2024, through Cuba, Haiti, Nicaragua, and Venezuela ("CHNV") humanitarian parole program established by the Department of Homeland Security itself. He was inspected by federal officers at the Miami, Florida port of entry. He was paroled into the United States under the authority of Section 212(d)(5)(A) of the Immigration and Nationality Act. He received an Employment Authorization Document ("EAD"), a Texas driver's license, and worked legally and productively in Austin, Texas. He was, in every meaningful sense, a person whom the federal government had invited in, documented, and authorized to live and work in this country.

On October 23, 2025, Petitioner filed an application to Register Permanent Residence or Adjust Status (Form I-485) under the Cuban Adjustment Act of 1966 — a statute that Congress specifically enacted to provide Cuban nationals with a pathway to permanent residence. He paid the \$1,440 filing fee. He completed his biometrics appointment. He met every statutory requirement. His application was accepted and receipted by U.S. Citizenship and Immigration Services ("USCIS").

Then, through no fault of Petitioner's, the government trapped him in an impossible situation — a bureaucratic Catch-22 of the government's own making. On December 2, 2025, USCIS issued Policy Memorandum PM-602-0192, which imposed a blanket hold on all benefit adjudications for nationals of nineteen "high-risk" countries, including Cuba. On January 1, 2026, USCIS expanded this hold through Policy Memorandum PM-602-0194 to cover thirty-nine countries, reaffirming that Cuba remained on the list. Under these memoranda, USCIS literally could not — and cannot — adjudicate Petitioner's I-485 application. The hold "remains in place until affirmatively lifted or modified by USCIS leadership," with no timeline whatsoever for its removal.

Meanwhile, ICE arrested Petitioner at a gas station in Austin, Texas, on the basis of an expired driver's license — a civil traffic infraction, not a criminal offense under Texas law. Petitioner was placed in removal proceedings before Immigration Judge Eric J. Tijerina at the Pearsall Immigration Court. Over the course of twelve hearings spanning seven months, the Immigration Judge repeatedly continued the case to allow USCIS to

adjudicate the I-485. DHS's own counsel informed the court that USCIS had placed the application on a "permanent hold." On February 24, 2026, the Immigration Judge issued an ultimatum: if the I-485 was not approved by March 10, 2026, the case would be deemed abandoned. On March 10, 2026, with USCIS still unable to act due to its own policy, the Immigration Judge deemed Petitioner's adjustment application abandoned and ordered his removal to Cuba.

The injustice of this result cannot be overstated. The government invited Petitioner into this country. The government accepted his application for permanent residence. The government froze that application through its own internal policy memorandum. And the government now seeks to deport Petitioner because the government itself would not process his application. This is the very definition of a due process violation. This Court has both authority and the duty to intervene.

II. STATEMENT OF FACTS

1. Petitioner Ronal Miguel Reyes Blazquez is a citizen and national of Cuba, born on

. He is twenty-three years of age.

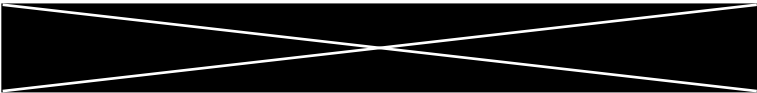
2. On April 16, 2024, Petitioner entered the United States at the Miami, Florida port of entry through the CHNV humanitarian parole program established by the Department of Homeland Security. His I-94 Arrival/Departure Record, Number 860420890A3, reflects a class of admission of "CHP" (Cuban Humanitarian Parole). He was inspected and paroled by Customs and Border Protection Officer No. 1178.

3. Petitioner's parole was authorized until April 15, 2026, pursuant to Section 212(d)(5)(A) of the Immigration and Nationality Act, 8 U.S.C. § 1182(d)(5)(A). He was issued a valid Cuban passport, number L413204.

4. Following his lawful parole, Petitioner received an Employment Authorization Document (EAD), Card Number , under category C11 (Parolee), valid through . He also obtained a Texas Driver License, number , Class C, likewise valid through .

5. Petitioner established himself in Austin, Texas, where he resided at 

 and subsequently at 

 He worked lawfully using his government-issued EAD and contributed productively to his community.

6. On June 4, 2024, Petitioner completed his biometrics appointment at the USCIS Austin Field Office, 11301 Lakeline Boulevard, Austin, Texas.

7. On October 23, 2025, Petitioner filed Form I-485, Application to Register Permanent Residence or Adjust Status, under the Cuban Adjustment Act of 1966, Pub. L. No. 89-732, 80 Stat. 1161. The application was receipted by USCIS under Receipt Number

 Petitioner paid the required filing fee of \$1,440.00.

8. Petitioner met all statutory requirements for adjustment of status under the Cuban Adjustment Act: he is a Cuban citizen, he was inspected and paroled into the United States, he had been physically present in the United States for more than one year, he had filed the required application, and he had no criminal record of any kind.

9. On December 2, 2025 — approximately six weeks after Petitioner filed his I-485 — USCIS issued Policy Memorandum PM-602-0192, which imposed a blanket adjudicative hold on all benefit applications filed by nationals of nineteen countries designated as "high-risk," including Cuba. This policy memorandum was issued without notice-and-comment rulemaking and without any individualized assessment of the affected applicants.

10. On January 1, 2026, USCIS expanded this hold through Policy Memorandum PM-602-0194, which added twenty additional countries to the list and reaffirmed that Cuba remained subject to the hold. USCIS explicitly stated that the hold "remains in place until affirmatively lifted or modified by USCIS leadership." No timeline was provided for any such lifting or modification.

11. The effect of these policy memoranda on Petitioner was immediate and devastating: USCIS could not, and cannot, adjudicate his pending I-485 application. The application remains in administrative limbo — filed, receipted, paid for, and biometrically processed, but is incapable of being brought to a final decision.

12. At an unspecified date prior to his detention, ICE officers arrested Petitioner at a gas station in Austin, Texas. The stated basis for the arrest was an expired driver's license — a civil traffic infraction that is not a criminal offense under Texas law. Petitioners had no criminal record whatsoever. He had never been arrested, charged, or convicted of any crime. He had never violated any term of parole.

13. Petitioner was placed in detention at the T. Don Hutto Residential Center, 1001 Welch Street, Taylor, Texas 76574, where he has been detained for approximately eight months as of the filing of this memorandum.

14. Petitioner was placed in removal proceedings before Immigration Judge Eric J. Tijerina at the Pearsall Immigration Court. Over the following months, the court

conducted twelve hearings: August 13, September 23, October 14, October 28, November 18, December 2, December 16, 2025, and January 9, January 29, February 12, February 24, and March 10, 2026.

15. At multiple hearings, DHS counsel informed the Immigration Court that Petitioner's I-485 application had been placed on a "permanent hold" by USCIS and could not be adjudicated. The Immigration Judge repeatedly continued the case to allow USCIS additional time to process the application.

16. At hearings, Petitioner stated that he was not fearful of returning to Cuba, a statement that was made in the context of a fear screening and did not constitute a waiver of his statutory right to adjustment of status under the Cuban Adjustment Act.

17. On February 24, 2026, Immigration Judge Tijerina warned that if the I-485 was not approved by March 10, 2026, the court would deem the adjustment application abandoned.

18. On March 10, 2026, with USCIS still unable to adjudicate the I-485 due to its own policy hold, Immigration Judge Tijerina deemed Petitioner's adjustment application abandoned and ordered Petitioner's removal to Cuba. Petitioner reserved his right to appeal.

19. In February 2026, Petitioner filed an Emergency Petition for Writ of Habeas Corpus in this Court, which was docketed as Case No. 1:26-cv-00329-DAE. The government filed its response on February 17, 2026 (ECF No. 4), and Petitioner filed a traverse on approximately March 2, 2026.

20. On March 19, 2026, Petitioner filed a Notice of Appeal with the Board of Immigration Appeals, transmitted by certified mail to both the BIA at Falls Church, Virginia and the Pearsall Immigration Court. The appeal deadline is April 9, 2026.

21. As of the date of this filing, Petitioner remains detained at T. Don Hutto, his I-485 remains on indefinite hold, his BIA appeal remains pending, and he faces imminent removal to Cuba — a country to which he will be permanently exiled, stripped of the statutory right Congress granted him under the Cuban Adjustment Act.

III. ARGUMENT

A. The Government Created an Unconstitutional Catch-22 That Violates Due Process

1. The USCIS Adjudicative Hold Policy

On December 2, 2025, USCIS issued Policy Memorandum PM-602-0192, which imposed a sweeping adjudicative hold on all immigration benefit applications filed by nationals of nineteen countries that USCIS designated as "high-risk." Cuba was explicitly listed among these countries. The memorandum directed all USCIS adjudicators to cease processing any pending or newly filed applications for adjustment of status, naturalization, or other immigration benefits from nationals of these designated countries.

On January 1, 2026, USCIS expanded this hold through a second Policy Memorandum, PM-602-0194, which added twenty additional countries to the list and reaffirmed that Cuba remained subject to the adjudicative freeze. The expanded memorandum stated in unambiguous terms that the hold "remains in place until affirmatively lifted or modified by USCIS leadership." No timeline was provided. No criteria were established for when or under what circumstances the hold might be lifted. No individualized assessment was required or permitted. The hold was, and remains, a blanket prohibition applied to every Cuban national with a pending application, regardless of the merits of any individual case.

Critically, Petitioner filed his I-485 application on October 23, 2025 — more than five weeks *before* the first adjudicative hold was imposed. At the time Petitioner filed, paid the \$1,440 fee, and completed his biometrics, there was no indication whatsoever that

USCIS would subsequently freeze all Cuban adjustment applications. The hold was imposed retroactively on Petitioner's already-pending application, fundamentally altering the rules after he had already complied with every requirement imposed upon him.

The result is that USCIS itself has stated, through its own policy memoranda, that it cannot and will not adjudicate Petitioner's I-485. The application sits in administrative limbo — filed, receipted, paid for, biometrically processed, and meeting every statutory requirement — but incapable of being brought to a final decision because of an internal agency policy that Petitioner had no role in creating and no ability to challenge or change.

2. The Impossible Catch-22

The fundamental due process problem in this case can be stated simply: the government created both halves of an impossible dilemma and then punished Petitioner for being caught in it.

On one side: USCIS cannot approve Petitioner's I-485 because of its own adjudicative hold policy. This is not a matter of Petitioner failing to provide evidence, missing a deadline, or otherwise being deficient in his application. USCIS has not denied the application on the merits. USCIS has not found Petitioner ineligible. USCIS has simply refused to act — on any Cuban national's application — because of an internal policy decision made at the highest levels of agency leadership.

On the other side: Immigration Judge Tijerina ordered Petitioner's removal to Cuba precisely because USCIS had not processed the I-485. After twelve hearings over seven months, the court issued an ultimatum on February 24, 2026: if the I-485 was not approved by March 10, 2026, the adjustment application would be deemed abandoned. On March 10, 2026, with USCIS still unable to act due to its own policy, the Immigration Judge carried out the ultimatum and ordered removal.

But the I-485 was not "abandoned" by Petitioner. Petitioner filed his application, paid his fee, completed biometrics, and appeared at every hearing. He did everything the law required of him. The application was frozen — not abandoned — by the United States government itself. The Immigration Judge's characterization of the application as "abandoned" under 8 C.F.R. § 1003.31(h) is a legal fiction that does not withstand scrutiny. That regulation contemplates abandonment by the respondent — a failure by the applicant to take a required action. Here, the failure was the government's, not Petitioner's.

The Supreme Court has long held that due process prohibits the government from depriving a person of liberty or a protected interest through fundamentally unfair procedures. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). Due process, at its irreducible core, requires that the government act with basic fairness when taking action that affects a person's life, liberty, or property. *Id.* In *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001), the Supreme Court reaffirmed that the Due Process Clause applies with full

force to all persons within the United States, "including aliens, whether their presence here is lawful, unlawful, temporary, or permanent."

There is nothing fair about what the government has done to Petitioner. The government invited him in. The government authorized his presence and employment. The government accepted his application for adjustment. The government froze his application. And the government now seeks to deport him because the government will not process his application. This is the very paradigm of a due process violation — a proceeding so fundamentally unfair that the result cannot stand.

3. The Immigration Judge's Order Was Legally Deficient

The Immigration Judge's March 10, 2026 order is legally deficient for the independent reason that it misapplied the concept of "abandonment" under applicable regulations. Under 8 C.F.R. § 1003.31(h), a case may be deemed abandoned when the respondent fails to take the required action within the time set by the Immigration Judge. The regulation is designed to address situations where an applicant willfully fails to prosecute his or her case — for example, by failing to appear at a hearing, failing to file required documents, or failing to respond to a court order.

None of those circumstances exist here. Petitioner appeared at every single one of his twelve hearings. He filed his I-485 and paid the filing fee. He completed biometrics. He reserved his right to appeal. He did not fail to take any action within his control. The only

"failure" was USCIS's refusal to adjudicate his application — a refusal compelled by USCIS's own internal policy, which was imposed after Petitioner had already filed.

Moreover, the Immigration Judge was fully aware that USCIS had placed the I-485 on a permanent hold. DHS's own counsel informed the court of this fact at multiple hearings. The court itself repeatedly continued the case to give USCIS more time. Despite this knowledge, the court ultimately imposed an arbitrary deadline of March 10, 2026, and deemed the application abandoned when a *different government agency* failed to act. This effectively punished Petitioner for a condition entirely beyond his control. An Immigration Judge cannot set a deadline for action that must be taken by a third-party agency that has publicly declared it will not act and then blame the applicant for the agency's inaction. Such a procedure violates fundamental fairness and due process.

B. Petitioner Was Lawfully Paroled and Has a Statutory Right Under the Cuban Adjustment Act

1. Lawful Parole Under INA § 212(d)(5)(A)

Petitioner's entry into the United States was entirely lawful. He entered through the CHNV humanitarian parole program, which was established by the Department of Homeland Security under the authority of Section 212(d)(5)(A) of the Immigration and Nationality Act, 8 U.S.C. § 1182(d)(5)(A). That provision authorizes the Attorney General (now the Secretary of Homeland Security) to parole into the United States "on a case-by-case basis for urgent humanitarian reasons or significant public benefit any alien applying for admission."

Petitioner's I-94 Arrival/Departure Record confirms that he was inspected and admitted at the Miami, Florida port of entry on April 16, 2024, with a class of admission designated as "CHP" — Cuban Humanitarian Parole. He was inspected by CBP Officer No. 1178. He was paroled until April 15, 2026. There is no dispute about the lawfulness of his entry. The government itself authorized it.

This fact is critical because it distinguishes Petitioner's case from the Fifth Circuit's recent decision in *Buenrostro-Mendez v. Bondi*, 2026 WL 323330 (5th Cir. 2026). In *Buenrostro-Mendez*, the Fifth Circuit addressed the status of individuals who entered

the United States without inspection — a fundamentally different category of entrants. That case involved persons who had no lawful basis for their presence in the United States and had not been inspected or paroled by any federal authority.

Petitioner's situation is the opposite. He did not enter without inspection. He was inspected, documented, paroled, given an I-94, issued an EAD, and authorized to live and work in the United States. The government's own records confirm his lawful entry. *Buenrostro-Mendez* is therefore entirely inapplicable to this case, and any attempt by Respondents to rely on it should be rejected.

2. The Cuban Adjustment Act of 1966

The Cuban Adjustment Act of 1966, Pub. L. No. 89-732, 80 Stat. 1161, codified at 8 U.S.C. § 1255 note, represents one of the most specific and enduring expressions of congressional immigration policy. Enacted during the Cold War to provide relief to Cubans fleeing the Castro regime, the Act provides that any Cuban national who has been "inspected and admitted or paroled" into the United States and who has been physically present for at least one year may apply for adjustment of status to lawful permanent resident.

Petitioner meets every single requirement of the Cuban Adjustment Act: (1) he is a citizen and national of Cuba; (2) he was inspected and paroled into the United States on April 16, 2024; (3) he has been physically present in the United States for well over one

year; (4) he filed the required Form I-485 on October 23, 2025; and (5) he has no criminal record of any kind. There is no statutory basis for denying his application on the merits.

The Cuban Adjustment Act has not been repealed. It has not been amended to exclude parolees who entered through the CHNV program. It has not been superseded by any subsequent legislation. It remains fully in effect as a valid act of Congress. Under Article I, Section 8 of the Constitution, Congress has plenary power over immigration. *INS v. Chadha*, 462 U.S. 919, 940-41 (1983). The Cuban Adjustment Act represents a specific and deliberate exercise of that power — a congressional determination that Cuban nationals who have been paroled into the United States should have a pathway to permanent residence.

Deporting Petitioner to Cuba would permanently and irreparably deprive him of this congressionally granted right. Once removed, he cannot re-enter the United States to pursue his pending I-485 application. His adjustment application would be rendered moot. The specific statutory benefit that Congress intended for him — and for all similarly situated Cuban parolees — would be nullified by executive action.

3. The USCIS Hold Cannot Override the Cuban Adjustment Act

The USCIS adjudicative hold imposed by Policy Memoranda PM-602-0192 and PM-602-0194 raises profound separation-of-powers concerns. These are internal agency

policy memoranda — they were not enacted by Congress, they were not promulgated through notice-and-comment rulemaking under the Administrative Procedure Act, and they carry no force of law. Yet their practical effect is to nullify the Cuban Adjustment Act for an entire class of people: every Cuban national with a pending or future I-485 application.

An executive agency cannot, through internal policy memoranda, effectively suspend the operation of a statute enacted by Congress. This principle is foundational to the constitutional separation of powers. As the Supreme Court held in *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U.S. 579, 588 (1952), the President's power — and by extension, the executive branch's power — must stem "either from an act of Congress or from the Constitution itself." The executive branch has no authority to unilaterally suspend or nullify a congressional statute through administrative fiat.

The Cuban Adjustment Act gives Cuban parolees a statutory right to apply for adjustment. USCIS's blanket hold prevents any Cuban national from obtaining adjustment. The effect is identical to a repeal of the CAA for Cuban nationals — but without any act of Congress. This is not a legitimate exercise of prosecutorial discretion or agency priority-setting. This is the executive branch overriding the legislative branch's express command, in direct contravention of the constitutional structure.

Moreover, the hold was imposed retroactively on applications that were already pending. Petitioner filed his I-485 on October 23, 2025. He relied on the existing legal

framework when he filed. He paid \$1,440 in fees. The government's retroactive imposition of a blanket hold on his already-pending application, without any individualized assessment or any avenue for relief, raises additional due process concerns under the principles articulated in *Mathews v. Eldridge*, 424 U.S. at 335.

C. Petitioner's Prolonged Detention Violates the Fifth Amendment

1. Due Process and Prolonged Detention

Petitioner has been detained at the T. Don Hutto Residential Center for approximately eight months. During this entire period, he has not received an individualized bond hearing at which a neutral decision-maker assessed whether his continued detention is justified based on his individual circumstances — specifically, whether he poses a flight risk or a danger to the community.

The Supreme Court has made clear that indefinite detention of aliens raises serious constitutional concerns. In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Court held that the Due Process Clause does not permit the government to detain an alien indefinitely when removal is not reasonably foreseeable. The Court stated: "Freedom from imprisonment — from government custody, detention, or other forms of physical restraint — lies at the heart of the liberty that [the Due Process] Clause protects." *Id.* at 690. The Court further recognized a "serious constitutional threat" when detention "no

longer bear[s] [a] reasonable relation to the purpose for which the individual was committed." *Id.* at 690 (internal quotation marks omitted).

In *Demore v. Kim*, 538 U.S. 510 (2003), while the Court upheld mandatory detention during removal proceedings in certain circumstances, Justice Kennedy's controlling concurrence emphasized that a detained alien "could be entitled to an individualized determination as to his risk of flight and dangerousness if the continued detention became unreasonable or unjustified." *Id.* at 532 (Kennedy, J., concurring). Eight months of detention — with no resolution in sight, a BIA appeal pending, a habeas petition pending, and an I-485 on indefinite hold — is unreasonable and unjustified by any measure.

2. Petitioner Poses No Flight Risk and No Danger

There is no rational basis for Petitioner's continued detention. He poses no flight risk and no danger to the community:

Petitioner has no criminal record whatsoever. He has never been arrested for, charged with, or convicted of any criminal offense. The expired driver's license that triggered his arrest is a civil traffic infraction under Texas law — it is not a crime.

Petitioner entered the United States lawfully through the CHNV humanitarian parole program. He did not enter surreptitiously or in violation of any law.

Petitioner has a pending I-485 application under the Cuban Adjustment Act. He has every incentive to remain in the United States and to comply with all legal requirements in order to pursue his application for permanent residence.

Petitioner has family ties in the United States, including his first cousin Yeneysi Quevedo, a lawful permanent resident residing in Austin, Texas.

Petitioner worked lawfully in the United States with a valid Employment Authorization Document and contributed productively to his community.

Petitioner never violated any condition of his parole at any time prior to his arrest.

Under any individualized assessment, Petitioner should be released from detention pending resolution of his habeas petition, his BIA appeal, and his I-485 application. His continued incarceration serves no legitimate government interest and imposes a severe and disproportionate burden on a person who has done nothing wrong.

3. The Fifth Amendment Applies to All Persons

The text of the Fifth Amendment is unambiguous: "No *person* shall be deprived of life, liberty, or property, without due process of law." U.S. Const. amend. V (emphasis added). The amendment does not say "no citizen." It says "no person."

The Supreme Court has repeatedly confirmed that the Due Process Clause applies to all persons within the United States, regardless of immigration status. In *Zadvydas*, the Court stated: "[T]he Due Process Clause applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent." 533 U.S. at 693. In *Reno v. Flores*, 507 U.S. 292, 306 (1993), the Court affirmed that "it is well established that the Fifth Amendment entitles aliens to due process of law in deportation proceedings."

Petitioner is a person within the United States. He is entitled to due process. The government's treatment of him — inviting him in, freezing his application, detaining him for eight months, and ordering his deportation because of the government's own policy — violates due process at every level.

D. This Court Has Jurisdiction and Authority to Grant Relief

This Court has jurisdiction to entertain this emergency motion and to grant the requested relief. The federal habeas corpus statute, 28 U.S.C. § 2241, grants district court's jurisdiction to hear habeas petitions from persons held in custody in violation of the Constitution, laws, or treaties of the United States. Petitioner's habeas petition is pending before this Court, and this Court has full authority to address all issues arising from that petition, including emergency motions for injunctive relief.

The All Writs Act, 28 U.S.C. § 1651, further provides that federal courts "may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law." This includes the authority to issue temporary restraining orders and preliminary injunctions to preserve the status quo and prevent irreparable harm while the underlying habeas petition is adjudicated.

The Supreme Court has recognized that federal courts possess inherent authority to preserve the status quo pending resolution of habeas petitions. In *Hamdi v. Rumsfeld*, 542 U.S. 507 (2004), the Court confirmed that habeas corpus is the "fundamental instrument for safeguarding individual freedom against arbitrary and lawless state action" and that the federal courts have "undoubted authority" to hear habeas claims and to fashion appropriate relief. *Id.* at 525 (quoting *Harris v. Nelson*, 394 U.S. 286, 290-91 (1969)).

Accordingly, this Court has both jurisdiction and authority to issue a temporary restraining order and preliminary injunction preventing Petitioner's removal from the United States, ordering Petitioner's release from detention or, alternatively, requiring an individualized bond hearing, and directing USCIS to adjudicate Petitioner's pending I-485 application.

E. The Four-Factor Test for Injunctive Relief Is Met

To obtain a temporary restraining order or preliminary injunction, a movant must demonstrate: (1) a substantial likelihood of success on the merits; (2) a substantial threat of irreparable harm if the injunction is not granted; (3) that the threatened harm to the movant outweighs the threatened harm to the opposing party; and (4) that granting the injunction will not disserve the public interest. *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008). All four factors weigh decisively in Petitioner's favor.

1. Substantial Likelihood of Success on the Merits

Petitioners have demonstrated a strong likelihood of success on the merits of his habeas petition and underlying claims. He is a lawful parolee who entered through the government's own humanitarian parole program. He has a pending I-485 application under the Cuban Adjustment Act — a statute enacted by Congress that remains fully in effect. He meets every statutory requirement for adjustment of status. The only reason

his application has not been adjudicated is the government's own blanket adjudicative hold, which was imposed after he filed and without any individualized assessment. The Immigration Judge's order of removal was based on a legal fiction — that Petitioner "abandoned" an application that the government froze. The due process violations are manifest. The separation-of-powers issues are serious. Petitioner is substantially likely to prevail.

2. Irreparable Harm

If Petitioner is removed to Cuba pending resolution of this case, the harm will be irreparable in the fullest sense of the word. Deportation is, by its nature, one of the most severe and irreversible actions the government can take against an individual. Once removed, Petitioner cannot re-enter the United States to pursue his pending I-485 application, his BIA appeal, or his habeas petition. His statutory right under the Cuban Adjustment Act — a right granted by Congress — will be permanently extinguished.

The Supreme Court has long recognized that the loss of constitutional and statutory rights constitutes irreparable harm per se. *Elrod v. Burns*, 427 U.S. 347, 373 (1976) ("The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury."). This principle applies with equal force to the deprivation of due process and statutory rights. Petitioner's removal would deprive him of his Fifth Amendment right to due process, his statutory right under the Cuban

Adjustment Act, and his right to judicial review of his habeas petition. Each of these losses is irreparable.

Furthermore, Petitioner faces the very real prospect of being exiled to a country governed by an authoritarian regime — without his family, without his community, and without the future that the United States government promised him when it paroled him into this country.

3. Balance of Equities

The balance of equities tips sharply in Petitioner's favor. On one side: Petitioner faces permanent deportation to Cuba, the loss of his pending I-485 application, the loss of his statutory right under the Cuban Adjustment Act, separation from his family, and the extinguishment of every legal remedy available to him. On the other side: the government would suffer no cognizable harm from maintaining the status quo. Petitioner is already detained — a TRO simply prevents his removal while his legal claims are adjudicated. The government has no legitimate interest in deporting a person whose only "offense" is that a different arm of the government will not process his application.

Alternatively, if the Court orders Petitioner's release on bond or conditions, the government still suffers no meaningful harm. Petitioner has no criminal record, has family in Austin, has a pending adjustment application, and has every incentive to appear for all future proceedings.

4. Public Interest

The public interest strongly favors granting injunctive relief. As the Supreme Court stated in *Nken v. Holder*, 556 U.S. 418, 435 (2009), there is always a public interest in preventing the violation of a party's constitutional rights. The public also has an interest in the proper functioning of the immigration system — a system in which the government's own agencies do not work at cross-purposes to trap individuals in impossible situations. The public has an interest in ensuring that statutes enacted by Congress — including the Cuban Adjustment Act — are given effect rather than nullified by executive policy memoranda. And the public has an interest in ensuring that individuals who were invited into this country through official government programs are not summarily deported when a different part of the government changes its internal policies.

Granting a TRO preserves the status quo and allows this Court to adjudicate the merits of Petitioner's claims in an orderly fashion. Denying a TRO would render this entire proceeding moot and would allow the government to accomplish through deportation what it cannot accomplish through law: the permanent deprivation of Petitioner's constitutional and statutory rights without due process of law.

IV. CONCLUSION

This case distills to a single, devastating proposition: the United States government invited Ronal Miguel Reyes Blazquez into this country through its own official humanitarian parole program, accepted his application for permanent residence under a statute enacted by Congress, froze that application through an internal agency policy memorandum, detained him for eight months, and now seeks to deport him to Cuba because the government itself refuses to process his application.

This is not a close case. This is a fundamental violation of the Due Process Clause of the Fifth Amendment. This is a case in which the executive branch has effectively nullified an act of Congress — the Cuban Adjustment Act — for an entire class of people through internal policy memoranda that carry no force of law. This is a case in which a young man with no criminal record, who did everything the law asked of him, has been imprisoned for eight months and now faces permanent exile — not because of anything he did, but because of what the government refuses to do.

The Constitution does not permit this result. The Fifth Amendment does not permit this result. The separation of powers does not permit this result. And this Court should not permit this result.

Petitioner respectfully requests that this Court:

1. Issue a Temporary Restraining Order immediately preventing Respondents from removing, transferring, or deporting Petitioner from the United States pending resolution of this action.
2. Issue a Preliminary Injunction maintaining the status quo and preventing Petitioner's removal during the pendency of his habeas petition, his BIA appeal, and his I-485 application.
3. Order Respondents to release Petitioner from detention forthwith, or in the alternative, to provide Petitioner with an individualized bond hearing before a neutral decision-maker within 48 hours.
4. Order USCIS to adjudicate Petitioner's pending I-485 application, Receipt Number  on the merits within 30 days.
5. Order expedited briefing and consideration of Petitioner's habeas petition on the merits; and
6. Grant such other and further relief as this Court deems just, equitable, and proper.

Respectfully submitted,

Date: 03/20/2026

Ronal Miguel Reyes

RONAL MIGUEL REYES BLAZQUEZ

Petitioner, Pro Se

A#



T. Don Hutto Detention Center

1001 Welch Street

Taylor, TX 76574

CERTIFICATE OF SERVICE

I hereby certify that on the 20 day of March, 2026, a true and correct copy of the foregoing Memorandum of Law in Support of Petitioner's Emergency Motion for Temporary Restraining Order and Preliminary Injunction was served upon counsel for Respondents by the Court's CM/ECF electronic filing system and by email upon:

Tasha May

Special Assistant United States Attorney

601 N.W. Loop 410, Suite 600

San Antonio, Texas 78216

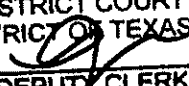
Ronal Miguel Reyes

RONAL MIGUEL REYES BLAZQUEZ

Petitioner, Pro Se

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

RONAL MIGUEL REYES BLAZQUEZ,
(A# )

Petitioner, Pro Se,

v.

Case No. 1:26-cv-00329-DAE

KRISTI NOEM, Secretary, Department of
Homeland Security, et al.,
Respondents.

CERTIFICATE OF SERVICE

I, RONAL MIGUEL REYES BLAZQUEZ, Petitioner Pro Se, hereby certify that on the 25 day of March, 2026, I caused a true and correct copy of the following documents to be served upon the parties listed below by depositing the same in the United States mail, first class postage prepaid:

Documents served:

1. Petitioner's Emergency Motion for Temporary Restraining Order and Preliminary Injunction to Prevent Removal
2. Memorandum of Law in Support of Petitioner's Emergency Motion for Temporary Restraining Order and Preliminary Injunction

Served upon:

1. Clerk of Court (ORIGINAL FILING)

U.S. District Court, Western District of Texas — Austin Division
501 West 5th Street, Suite 1100
Austin, TX 78701

2. Tasha May

Special Assistant United States Attorney
601 N.W. Loop 410, Suite 600
San Antonio, Texas 78216

3. Warden, T. Don Hutto Detention Center

1001 Welch Street
Taylor, TX 76574

4. Office of the Attorney General

U.S. Department of Justice

950 Pennsylvania Avenue, NW
Washington, DC 20530

5. ICE Office of the Principal Legal Advisor (OPLA)

DHS/ICE Chief Counsel — San Antonio
1015 Jackson-Keller Road, Suite 100
San Antonio, TX 78213

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

Executed on this 25 day of March, 2026.

Ronal Miguel Reyes

RONAL MIGUEL REYES BLAZQUEZ

Petitioner, Pro Se

A# 

T. Don Hutto Detention Center
1001 Welch Street
Taylor, TX 76574

FROM: RONAL MIGUEL REYES BLAZQUEZ

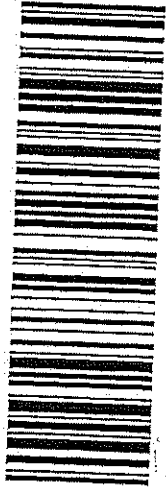


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