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Attorney for Petitioner

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

SERGIO DIAZ-MAR,

Petitioner.

v.

PAM BONDI,
United States Attorney General;

KRISTI NOEM,
Secretary of the United States Department of
Homeland Security;

TODD M. LYONS,
Director of United States Immigration and
Customs Enforcement;

MIGUEL VERGARA,
San Antonio Field Office Director of
Enforcement and Removal Operations, U.S.
Immigration and Customs Enforcement;

BOBBY THOMPSON,
Warden, South Texas Detention Complex

Respondents.

Civ. No. 26-cv-919-FB

DHS File Number:

MOTION FOR SUMMARY JUDGMENT

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1. Petitioners filed a Petition for Writ of Habeas Corpus on February 12, 2026. Dkt. 1. Respondents were served both electronically and via certified physical mail on Feb. 12, 2026. Dkt. 2.
2. On February 12, 2026, this Court ordered that Respondents file a response within five (5) days of the date of service. Dkt 4 at 2. Respondents were served both electronically on February 12, 2026 and via certified physical mail on February 13, 2026. Dt. 5. Respondents have failed to respond within the ordered timeframe.
3. Petitioner files this Motion for Summary Judgement based on Rule 56 of the Federal Rules of Civil Procedure.
4. A party opposing a motion shall file a response and supporting documents when available. W.D. Tex. Civ. R. CV-7.D.1. The response must contain a concise statement of the reasons for opposition to the motion and citations of the legal authorities on which the party relied. *Id.* Respondents have failed to file a response.
5. Petitioner requests that this Court file a summary judgment for a writ of habeas corpus.

PRAYER FOR EXPEDITED CONSIDERATION

6. Pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests expedited consideration. Each day of unlawful detention inflicts irreparable harm on Petitioner and her U.S. citizen children, depriving them of their mother's care, stability, and support. Prompt judicial intervention is necessary to protect Petitioner's constitutional rights and her family's well-being.

Respectfully submitted,

/s/ Dianisa Erica Sosa

Counsel for Petitioner
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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Sergio Diaz-Mar, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Motion for Summary Judgment are true and correct to the best of my knowledge.

Dated this 19th day of February, 2026

/s/ Dianisa Erica Sosa

Counsel for Petitioner
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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2026, I caused a true and correct copy of the foregoing Motion for Summary Judgment and all accompanying exhibits to be served by certified mail, return receipt requested, on the following:

U.S. Attorney's Office for the Western District of Texas
Attn: Stephanie Rico, Civil Process Clerk
601 N.W. Loop 410, Suite 600
San Antonio, TX 78216

Bobby Thompson
Warden, South Texas Detention Complex
566 Veteran's Drive
Pearsall, TX 78601

Service on the United States Attorney constitutes service on all named federal Respondents in this matter, and service has also been made directly on the Warden as Petitioner's immediate custodian.

Dated this 19th of February, 2026.

/s/ Dianisa Erica Sosa
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