UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

BHARATBHAI PATEL, Petitioner, v. KRISTI NOEM, et al., Respondents.	Case No. 1:26-cv-211

PETITIONER'S TIME-SENSITIVE MOTION FOR TEMPORARY RELEASE

Petitioner Bharatbhai Patel is scheduled for an interview on Thursday, March 12, 2026 at 1:50 p.m. local time in Nashville, Tennessee with U.S. Citizenship and Immigration Services for his Form I-485, Application to Adjust Status. (ECF No. 1-6). At that interview, USCIS will consider whether Petitioner is entitled to adjust his status to permanent resident status.

Petitioner has moved for reconsideration of the Court's order denying his request for injunctive relief in the form of immediate release from immigration detention. In the event the Court denies that motion or does not rule on it in the interim, Petitioner seeks brief, temporary release from ICE custody for the sole purpose of attending his green card interview this week, subject to whatever reasonable conditions ICE would impose, such as ankle monitoring, etc.

Petitioner's failure to attend the interview would result in his inability to seek adjustment of status to lawful permanent resident status. Because he cannot control his ability to attend the interview without Court intervention, Petitioner seeks temporary release for the sole purpose of attending his interview.

Such release could be effectuated through temporary supervised release subject to conditions, such as ankle monitoring, or requiring ICE to transport Petitioner to his green card interview. Absent such measures, Petitioner risks permanently losing the ability to seek adjustment of status (which, while his application may be denied, his failure to appear at his interview will certainly terminate his interest), and he would have no "concrete avenue" to seek adjustment if he prevails in this action but is unable to attend his interview due to detention. *Maldonado v. Noem*, No. 4:25-CV-2541, 2025 WL 1593133, at *3 (S.D. Tex. June 5, 2025).

WHEREFORE, Petitioner Bharathbai Patel respectfully requests that the Court permit, on conditions amenable to Respondents, his immediate, temporary release from ICE custody for the sole purpose of attending his upcoming green card interview on March 12, 2026 in Nashville, Tennessee.

Dated: March 10, 2026

Respectfully submitted,

/s/ James M. Slater

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Attorneys for Petitioner Bharatbhai Patel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this motion will be served on all counsel of record via CM/ECF.

/s/ James M. Slater
James M. Slater