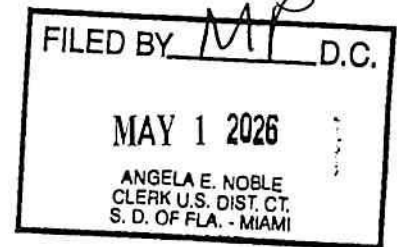


Felix Antonio Calas Batista

A# [REDACTED]



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FELIX ANTONIO CALAS BATISTA, Petitioner

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE), Respondent

EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS (28 U.S.C. §2241)

I. INTRODUCTION

Petitioner seeks immediate release due to prolonged detention, lack of foreseeable removal, and life-threatening medical condition.

IV. FACTS

Petitioner has been detained since December 16, 2025. He is a citizen of Cuba and cannot be removed in the foreseeable future.

Medical staff at the detention facility have treated Petitioner and warned that his open wound may lead to septicemia (sepsis) if not properly treated.

Petitioner suffers from cancer and faces imminent risk of death.

V. LEGAL ARGUMENT

Detention is unconstitutional under *Zadvydas v. Davis* because removal is not reasonably foreseeable.

Cuba does not readily accept repatriation and Petitioner has no ties to Mexico.

Continued detention constitutes deliberate indifference to serious medical needs.

VI. REQUEST FOR RELIEF

1. Immediate release; 2. Emergency hearing; 3. Any other relief.

Signed: Felix Antonio Calas Batista

* [Signature]