FILED IN THE U.S. DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
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UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF GEORGIA

COLUMBUS DIVISION

HARRY JOSÉ LACAYO MORENO, Petitioner,

v.

WARDEN, STEWART DETENTION CENTER, et al., Respondents.

EMERGENCY MOTION TO EXPEDITE HABEAS CORPUS PROCEEDINGS

INTRODUCTION

COMES NOW Petitioner Harry José Lacayo Moreno, proceeding Pro Se, and respectfully requests expedited consideration of the pending Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241.

This matter presents extraordinary constitutional, humanitarian, and emergency circumstances requiring immediate judicial intervention. Petitioner is a recently turned eighteen-year-old detainee who was arrested while voluntarily appearing at a routine immigration appointment despite prior compliance with immigration supervision obligations.

Petitioner respectfully submits that every additional day of detention causes ongoing and irreparable constitutional injury, emotional deterioration, educational disruption, psychological suffering, and heightened risk of retaliatory actions or removal before meaningful judicial review may occur.

FACTUAL BACKGROUND

Petitioner is a native and citizen of Nicaragua born on [redacted] Petitioner entered the United States on or about March 22, 2022 seeking safety and opportunity together with family members.

Prior to detention, Petitioner was actively attending and completing high school studies while attempting to build a stable and productive future. Petitioner's educational progress

and emotional development were abruptly interrupted when immigration authorities detained him on May 5, 2026 during a routine appointment.

Petitioner was not apprehended during criminal activity and does not possess a serious criminal history. Petitioner voluntarily appeared for immigration supervision obligations in good faith.

Since detention at Stewart Detention Center, Petitioner allegedly has experienced severe emotional distress, anxiety, depression, hopelessness, dehydration, fear, and psychological deterioration.

Petitioner additionally alleges severe rationing of food and water, repeated exposure to spoiled food, denial or delay of medical care, overcrowded conditions, unsanitary confinement conditions, verbal mistreatment by officers, and fear of retaliatory transfer or punitive segregation for seeking judicial protection.

LEGAL STANDARD

Federal courts possess broad authority to expedite habeas corpus proceedings where delay threatens irreparable constitutional harm or risks frustrating meaningful judicial review.

The writ of habeas corpus occupies a central constitutional role in protecting liberty interests against unlawful executive detention. See Boumediene v. Bush, 553 U.S. 723 (2008); INS v. St. Cyr, 533 U.S. 289 (2001).

Expedited treatment is especially appropriate where a detainee alleges unconstitutional conditions of confinement, denial of medical care, emotional deterioration, retaliatory conduct, or risk of removal before completion of judicial review.

Courts additionally recognize that youth, educational disruption, emotional vulnerability, and humanitarian concerns may further support emergency judicial intervention.

ARGUMENT

Immediate expedited review is necessary because Petitioner faces continuing and escalating harm each day detention continues.

First, Petitioner's age and recent transition into adulthood create extraordinary humanitarian concerns. Although Petitioner recently turned eighteen years old, he remains emotionally and educationally vulnerable. At the time of detention, Petitioner was actively attempting to complete high school education and continue personal development.

The abrupt interruption of education, emotional stability, and family life has caused substantial psychological distress and discouragement. Petitioner respectfully submits that prolonged detention under these circumstances risks permanent emotional and educational harm.

Second, Petitioner alleges dangerous and unconstitutional detention conditions involving severe food and water rationing, denial of adequate medical care, overcrowding, unsanitary confinement conditions, verbal abuse, and psychological suffering.

Third, Petitioner fears retaliatory transfer designed to interfere with federal jurisdiction and meaningful judicial review. Absent expedited intervention, transfer outside this district may substantially complicate effective review of constitutional claims.

Fourth, Petitioner fears deportation or transfer to a third country before adjudication of the pending habeas petition. Such removal would create irreparable injury incapable of adequate remedy after the fact.

Fifth, Petitioner's voluntary appearance at immigration appointments strongly demonstrates compliance and substantially undermines any assertion that Petitioner presents a meaningful flight risk.

Finally, Petitioner does not possess a serious criminal history and does not present a danger to public safety. Continued detention therefore imposes severe hardship without corresponding governmental necessity.

The balance of equities overwhelmingly favors expedited consideration because constitutional rights, humanitarian concerns, emotional well-being, and meaningful access to judicial review remain at stake.

REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

1. EXPEDITE all proceedings associated with the pending Petition for Writ of Habeas Corpus;

2. ORDER Respondents to file a response within an expedited timeframe established by the Court;

3. PRIORITIZE consideration of Petitioner's Motion for Immediate Release;

4. PROHIBIT retaliatory transfer outside the jurisdiction of this Court while proceedings remain pending;

5. PROHIBIT deportation or transfer to any third country prior to adjudication of the habeas proceedings;

6. GRANT any additional relief deemed just and proper under the law.

Respectfully submitted,

Harry Lacayo

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