FILED

JUL 10 2026

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JUAN DE LA CRUZ DABOIN MARTÍNEZ,
[redacted]

Petitioner,

v.

1:26-cv-5337-JLT-SAB

THE WARDEN OF CENTRAL VALLEY ANNEX;
THE ACTING DIRECTOR OF U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT;
THE SECRETARY OF THE DEPARTMENT OF HOMELAND SECURITY,
Respondents.

PETITIONER'S MOTION TO EXPEDITE CONSIDERATION OF PETITION FOR WRIT OF HABEAS CORPUS

Petitioner, Juan de la Cruz Daboin Martínez, proceeding pro se, respectfully moves this Court for an order expediting consideration of his Petition for Writ of Habeas Corpus filed pursuant to 28 U.S.C. § 2241.

In support of this Motion, Petitioner states as follows:

1. Petitioner is currently detained by U.S. Immigration and Customs Enforcement at the Central Valley Annex in McFarland, California.

2. Petitioner has filed a Petition for Writ of Habeas Corpus challenging the constitutionality of his continued civil immigration detention under the Due Process Clause of the Fifth Amendment.

3. Every additional day of unconstitutional detention results in the continued deprivation of Petitioner's fundamental liberty interest and constitutes irreparable harm that cannot be adequately remedied through monetary damages or any other form of relief after the fact.

4. Petitioner's detention is civil rather than criminal in nature. He has no criminal convictions, maintains a pending asylum application before the Immigration Court, has previously been granted employment authorization by United States Citizenship and

Immigration Services, and has consistently demonstrated his willingness to comply with all immigration proceedings.

5. Petitioner does not seek to delay or interfere with his pending removal proceedings. Rather, he requests only prompt judicial review of the legality of his continued detention.

6. Expedited consideration will not prejudice Respondents. Instead, it will ensure that the constitutional issues presented by the Petition are resolved without unnecessary delay while Petitioner remains deprived of his liberty.

7. The interests of justice strongly favor expedited consideration because habeas corpus exists to provide a prompt judicial remedy against unlawful executive detention. Boumediene v. Bush, 553 U.S. 723, 739 (2008).

8. Good cause therefore exists for this Court to expedite consideration of the pending Petition for Writ of Habeas Corpus.

WHEREFORE

A. Grant this Motion to Expedite;

B. Order Respondents to file a prompt response to the Petition for Writ of Habeas Corpus within such time as the Court deems appropriate;

C. Give expedited consideration to the Petition; and

D. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

[redacted]

Juan de la Cruz Daboin Martinez

[redacted]

Petitioner, Pro Se

Date: July 7, 2026

DECLARATION OF JUAN DE LA CRUZ DABOIN MARTÍNEZ

I, Juan de la Cruz Daboin Martínez, A-Number [redacted] declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct based upon my personal knowledge:

1. I am a native and citizen of Venezuela.

2. I entered the United States seeking protection because I feared returning to my home country. After my arrival, I timely filed my application for asylum within the one-year period required by law. My asylum case remains pending before the Immigration Court, and I continue to participate in those proceedings in good faith.

3. While my asylum application has been pending, United States Citizenship and Immigration Services granted me authorization to work in the United States. I obtained lawful employment, maintained a valid Texas driver's license, filed my tax returns, and did everything I could to comply with the laws of this country.

4. Since arriving in the United States, I have continuously lived here, established a stable residence, worked honestly, and built meaningful relationships within my community. I have always tried to conduct myself responsibly and to respect the laws of the United States.

5. On June 2, 2026, at approximately 11:00 a.m., I was stopped by a police officer in Oklahoma. The officer told me that I had been stopped for allegedly speeding. However, I was never issued a traffic citation, arrested for a criminal offense, or charged with violating any criminal law.

6. Approximately twenty to thirty minutes after the traffic stop began, the officer contacted U.S. Immigration and Customs Enforcement ('ICE'). Shortly thereafter, ICE officers arrived at the scene.

7. The ICE officers instructed me to get out of my vehicle and told me that I was not authorized to remain in the United States.

8. My partner immediately came to the scene and provided the officers with my immigration documents, including my valid Employment Authorization Document, my Texas driver's license, and documentation showing that my asylum application had been timely filed and remained pending.

9. Despite reviewing those documents, the officers stated that they were not valid and placed me into immigration custody.

10. After my arrest, I was transported to the Cimarron Detention Center in Oklahoma, where I remained for approximately ten days. I was later transferred to the Central Valley Annex detention facility in McFarland, California, where I remain detained today.

11. The transportation between detention facilities was one of the most difficult experiences I have endured. Throughout the transfer, I was restrained with handcuffs and leg shackles for extended periods of time. Although I was being held for civil immigration purposes and had not committed any crime, I was treated as though I were a dangerous criminal. The experience was humiliating, degrading, and emotionally traumatic.

12. I have never been convicted of a crime in the United States or in any other country. I have never attempted to harm anyone or place the community at risk.

13. I have always intended to comply with my immigration proceedings. My asylum application remains pending, and I fully intend to continue appearing before the Immigration Court whenever required until my case is resolved.

14. My detention has caused profound hardship for both me and my family. Being separated from my loved ones has been emotionally devastating. I have been unable to provide the emotional and financial support that my family depends upon, and every day that I remain detained causes additional suffering.

15. Throughout my time in the United States, I have worked hard to build an honest life. I have tried to obey the law, support myself through lawful employment, and contribute positively to my community. Friends, neighbors, and members of my community have written letters describing my honesty, integrity, strong moral character, and commitment to my family.

16. I respectfully ask this Court to consider the circumstances of my case. I am not asking the Court to decide my asylum application. I ask only that the Court review the legality of my continued detention. I do not believe my continued confinement is necessary because I do not present a danger to the community, and I have every intention of appearing at all future immigration proceedings.

17. If I am released, I will fully comply with every condition imposed by this Court or by the immigration authorities. I will continue to attend every hearing, comply with all reporting requirements, and respect the laws of the United States while my immigration case remains pending.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 7, 2026.

Respectfully submitted,

[redacted]

Juan de la Cruz Daboin Martínez

[redacted]