IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF GEORGIA

COLUMBUS DIVISION

ALEX EDUARDO UMAÑA MEJÍA,
A# [redacted]

Petitioner,

v.

STEPHEN SCHRANK, Warden, Stewart Detention Center;

TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement;

KRISTI NOEM, Secretary, U.S. Department of Homeland Security;

PAMELA BONDI, Attorney General of the United States,

Respondents.

Civil Action No. 26-1056

(Habeas Corpus, 28 U.S.C. § 2241)

MOTION TO EXPEDITE CONSIDERATION OF PETITION FOR WRIT OF HABEAS CORPUS AND ALL PENDING EMERGENCY MOTIONS, AND BRIEF IN SUPPORT

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA, COLUMBUS DIVISION:

COMES NOW, Petitioner Alex Eduardo Umaña Mejía ("Petitioner"), proceeding pro se, and respectfully moves this Honorable Court, pursuant to its inherent authority to manage and control its own docket, Rule 6(c)(1)(C) of the Federal Rules of Civil Procedure, and the established

practice of federal courts in immigration habeas matters, for an Order expediting consideration of Petitioner's Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 (the "Petition") and Petitioner's concurrently filed Emergency Motion for Immediate Release (the "Release Motion"), and shortening the time within which Respondents must file a Return or other responsive pleading. In support of this Motion, Petitioner states as follows.

I. RELIEF REQUESTED

1. By this Motion, Petitioner respectfully requests that this Court enter an Order:

I. Shortening the time for Respondents to file a Return to the Petition and a response to the Release Motion to no more than fourteen (14) calendar days from the date of service, rather than the thirty (30) to sixty (60) day period ordinarily available to the Government under Federal Rule of Civil Procedure 12(a)(3) and customary practice in civil actions against federal officers;

II. Setting an expedited briefing schedule for any traverse or reply Petitioner may file, and setting this matter for prompt evidentiary hearing or oral argument at the earliest date consistent with the Court's calendar;

III. Directing that, pending resolution of the Petition and the Release Motion on this expedited schedule, Respondents provide Petitioner and this Court no less than forty-eight (48) hours' advance notice of any intended transfer of Petitioner outside the Middle District of Georgia, or any intended removal of Petitioner from the United States; and

IV. Granting such other and further relief as this Court deems just and proper to ensure the prompt and meaningful adjudication of Petitioner's claims.

II. INTRODUCTION

2. Petitioner files this Motion to Expedite concurrently with, and in direct support of, his Petition for Writ of Habeas Corpus and his Emergency Motion for Immediate Release, both of which are incorporated herein by reference in their entirety. Petitioner respectfully submits that the ordinary, non-expedited civil litigation timeline — under which Respondents would ordinarily have between fourteen (14) and sixty (60) days to respond, with full briefing and decision potentially taking several additional months — is fundamentally incompatible with the nature of the claims and the urgency of the circumstances presented in this case.

3. Petitioner is not merely litigating an abstract legal question. He is, at this moment, confined in conditions that this Court has not yet had the opportunity to review, suffering from an

active, untreated throat infection, documented weight loss, and significant psychological distress, all while his family struggles in his absence as its primary means of financial support. Every week of delay in this Court's consideration of the Petition is a week of continued, potentially unlawful deprivation of liberty and continued exposure to the conditions described in detail in the Petition.

4 Federal courts in immigration habeas matters have long recognized the unique urgency that attends claims of unlawful civil detention, and have adopted general orders and individual practices designed to expedite the resolution of such claims precisely because delay itself compounds the harm the writ exists to remedy. Petitioner respectfully requests that this Court apply that same recognition to his case.

III. ARGUMENT

A. This Court Possesses Broad Inherent and Rule-Based Authority to Expedite Habeas Proceedings

5. A district court possesses broad inherent authority to manage its own docket and to control the timing of proceedings before it, including the authority to shorten otherwise applicable response periods where circumstances warrant expedited treatment. This authority is expressly reinforced in the habeas context: 28 U.S.C. § 2243 directs that a court considering a habeas petition "shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted," and federal courts retain broad discretion under their own habeas rules and practices to fix a response time shorter than the periods that would otherwise apply in ordinary civil litigation.

6. Federal Rule of Civil Procedure 6(c)(1)(C) further confirms that, when a motion is supported by an affidavit, that affidavit must be served with the motion, and courts retain discretion to shorten otherwise applicable notice periods upon a showing of good cause — a showing Petitioner respectfully submits is amply made here given the ongoing, documented harm described in the Petition and the Release Motion.

7. Numerous federal district courts handling immigration habeas petitions have adopted standing or general orders that contemplate expedited response and briefing schedules

substantially shorter than the default civil litigation timeline, recognizing that the ordinary pace of civil litigation is poorly suited to claims involving ongoing physical detention and active, compounding harm. Petitioner respectfully requests that this Court likewise adopt an expedited schedule appropriate to the urgency of his circumstances.

B. The Nature and Urgency of Petitioner's Claims Warrant Expedited Treatment

8. As set forth in detail in the Petition and the Release Motion, Petitioner's claims are not speculative or abstract; they describe specific, ongoing, and worsening harm, including an active and unresolved throat infection that has persisted since Petitioner's arrival at Stewart Detention Center, documented weight loss, repeated episodes of enforced starvation due to untreated physical immobility, and clinically significant psychological distress. These are not historical grievances capable of full remediation after the fact; they are live, continuing injuries that compound with each additional day this matter remains unresolved.

9. In addition to these ongoing physical and psychological harms, Petitioner has articulated a specific and reasonable fear that, absent expedited judicial attention, he may be transferred to a detention facility outside the jurisdiction of this Court, or removed from the United States altogether, before this Court has the opportunity to adjudicate the merits of his claims. Should either event occur during the pendency of an ordinary, non-expedited litigation schedule, this Court's ability to grant Petitioner meaningful relief could be irreparably compromised. Expedited consideration, including the request for advance notice of any transfer or removal set forth in Section I above, directly addresses and mitigates this risk.

10. Petitioner further notes that he proceeds in this matter pro se, without the assistance of retained counsel, and that the additional delay inherent in non-expedited proceedings falls with particular weight on detained, self-represented litigants, who lack the institutional resources and continuity of representation that might otherwise mitigate the practical burdens of a prolonged litigation timeline.

C. Expedited Treatment Will Not Unduly Prejudice Respondents

11. Petitioner respectfully submits that the modest acceleration of the briefing schedule requested in this Motion — a return period of fourteen (14) days rather than the thirty (30) to sixty (60) days ordinarily available — imposes no significant or undue burden on Respondents. The factual record concerning Petitioner's detention, including his immigration file, criminal history, and the circumstances of his custody, is readily available to Respondents as the parties with direct institutional knowledge and control over that information. Respondents are accordingly well-positioned to respond to the Petition within the expedited timeframe requested without prejudice to their ability to present a complete and considered response.

12. By contrast, the harm to Petitioner from continued adherence to the ordinary, non expedited timeline is substantial, ongoing, and, in significant part, irreparable, as set forth above and in the Petition and Release Motion. Where, as here, the burden of delay falls overwhelmingly and asymmetrically upon the party whose physical liberty and health are directly at stake, and the burden of expedition upon the opposing party is comparatively minimal, the balance of interests favors the expedited schedule requested herein.

D. An Order Requiring Advance Notice of Transfer or Removal Is a Modest and Well-Established Safeguard

13. Petitioner's request that this Court order Respondents to provide forty-eight (48) hours' advance notice of any intended transfer of Petitioner outside this district, or any intended removal from the United States, pending resolution of the Petition, mirrors protective measures that federal courts handling immigration habeas matters have adopted as a matter of standing practice precisely because such transfers and removals, if effectuated without notice, can functionally defeat the court's jurisdiction and the practical value of the writ itself. This request is not a request for substantive relief on the merits of the Petition; it is a modest, process-oriented safeguard necessary to ensure that this Court's eventual ruling on the Petition retains practical meaning and effect.

IV. CONCLUSION

14. For the foregoing reasons, and for the reasons set forth in the concurrently filed Petition for Writ of Habeas Corpus and Emergency Motion for Immediate Release, both incorporated herein by reference, Petitioner respectfully requests that this Court grant this Motion to Expedite in its entirety, shorten the time for Respondents to respond to the Petition and the Release Motion, set an expedited schedule for any further briefing and for a prompt hearing, and order that Petitioner receive advance notice of any intended transfer or removal during the pendency of these proceedings.

VERIFICATION

I, Alex Eduardo Umaña Mejía, Petitioner in the above-captioned action, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I have read the foregoing Motion to Expedite, that I am familiar with its contents, and that the factual statements contained therein, including those incorporated by reference from the Petition for Writ of Habeas Corpus and the Emergency Motion for Immediate Release filed concurrently herewith, are true and correct to the best of my own personal knowledge, information, and belief.

I further declare that I am currently confined at the Stewart Detention Center, 146 CCA Road, Lumpkin, Georgia 31815, that I am proceeding in this matter without the assistance of retained counsel, and that I respectfully request that this Honorable Court construe this pro se Motion liberally, consistent with the principle that filings submitted by unrepresented litigants are held to less stringent standards than formal pleadings drafted by attorneys.

Executed this _____ day of _____, 2026, at Lumpkin, Georgia.

Alex Umana Mejía

Alex Eduardo Umaña Mejía
Petitioner, Pro Se
A-Number: [redacted]
Stewart Detention Center
146 CCA Road
Lumpkin, Georgia 31815
Date: 7/6/26

CERTIFICATE OF SERVICE

I, Alex Eduardo Umaña Mejía, Petitioner, Pro Se, hereby certify that, to the best of my ability under the constraints of my current civil immigration detention, a true and correct copy of the foregoing Motion to Expedite has been or will be served by United States Mail, postage prepaid, or by such other means as may be available to me as a detained, unrepresented litigant, upon the following:

United States Attorney for the Middle District of Georgia
Office of the United States Attorney
P.O. Box 1702
Macon, Georgia 31202

Office of the Field Office Director
U.S. Immigration and Customs Enforcement
Atlanta Field Office
180 Ted Turner Drive SW
Atlanta, Georgia 30303

Office of the General Counsel
U.S. Department of Homeland Security
Washington, D.C. 20528

Office of the Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530

Warden, Stewart Detention Center
146 CCA Road
Lumpkin, Georgia 31815

Alex Umana Mejía

Alex Eduardo Umaña Mejía
Petitioner, Pro Se

A-Number [redacted]
Stewart Detention Center
146 CCA Road
Lumpkin, Georgia 31815
Date: _____