JUDGE DAVID BRIONES

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CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY CLERK

UNITED STATES DISTRICT COURT

for the

FILED
August 21, 2026
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY: Elizabeth Y. Martinez
DEPUTY

Douglas Francisco Hernandez Reyes
Petitioner

v.

Michael Watkins Warden of camp East Montana Mary De Anda-Ibarra ICE Area Field Office Director TODD M. Lyons, Acting ICE Director and Pamela Bondi attorney General
Respondent
(name of warden or authorized person having custody of petitioner)

Case No. EP 26 CV 2172
(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Douglas Francisco Hernandez Reyes
   (b) Other names you have used: Douglas Francisco Hernandez Reyes
2. Place of confinement:
   (a) Name of institution: El Paso SPC
   (b) Address: 8915 Montana Ave El Paso TX 79925
   (c) Your identification number: [redacted]
3. Are you currently being held on orders by:
   ☑ Federal authorities ☐ State authorities ☐ Other - explain:
4. Are you currently:
   ☐ A pretrial detainee (waiting for trial on criminal charges)
   ☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
   If you are currently serving a sentence, provide:
   (a) Name and location of court that sentenced you:
   (b) Docket number of criminal case:
   (c) Date of sentencing:
   ☐ Being held on an immigration charge
   ☐ Other *(explain)*: I was arrested in a local place waiting to go to work with no kind of legal documents. Did not Acquire enough time to adjust in the right matter.

Decision or Action You Are Challenging

5. What are you challenging in this petition:
   ☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

- ☐ Pretrial detention
- ☐ Immigration detention
- ☐ Detainer
- ☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- ☐ Disciplinary proceedings
- ☑ Other *(explain)*: Not Given a list of Pro Bono lawyers to help me understand my Situation and dont have any pending chminal charges to hold me incarcerated.

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: El Paso SPC 8915 Montana Ave El Paso, TX 79925

(b) Docket number, case number, or opinion number:

(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*:
Not Given a list of Pro Bono lawyers to help me follow up on my Case.
Not Given any options to settle my deportation procedure the proper manner I have never been deported Before

(d) Date of the decision or action:

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☑ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: El Paso SPC 8915 Montana Ave El Paso TX 79925

(2) Date of filing: 1/16/2026

(3) Docket number, case number, or opinion number: [redacted]

(4) Result: Was Granted or Requested for Asylum political (I-589)

(5) Date of result: 1/16/2026

(6) Issues raised: None

(b) If you answered "No," explain why you did not appeal: N/A

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☑ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: El Paso SPC 8915 Montana Ave El Paso, TX 79925

(2) Date of filing: ~~2/3/2026~~ 2/2/2026

(3) Docket number, case number, or opinion number: [redacted]

(4) Result: Returned or Submitted Application for political Asylum

(5) Date of result: ~~2/3/2026~~ 2/2/2026

(6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal: N/A

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☑ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: El Paso SPC 8915 Montana Ave El Paso TX 79925

(2) Date of filing: ~~2/23/2026~~ 2/23/2026

(3) Docket number, case number, or opinion number: [redacted]

(4) Result:

(5) Date of result: 2/23/2026

(6) Issues raised: Not given a pro bono list of lawyers until this court date. Did not understand my situation or procedures.

(b) If you answered "No," explain why you did not file a third appeal: N/A

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes ☑ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes ☐ No

N/A

If "Yes," provide:

(1) Name of court: N/A

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court: N/A

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: N/A

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☐ Yes ☑ No

If "Yes," provide:

(a) Date you were taken into immigration custody:

(b) Date of the removal or reinstatement order:

(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes ☑ No

If "Yes," provide:

(1) Date of filing: N/A

(2) Case number:

(3) Result:

(4) Date of result:

(5) Issues raised:

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court: N/A

(2) Date of filing:

(3) Case number:

(4) Result:

(5) Date of result:

(6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☑ Yes ☐ No

If "Yes," provide:

(a) Kind of petition, motion, or application: I-589

(b) Name of the authority, agency, or court: El Paso SPC 8915 Montana Ave El Paso TX 79925

(c) Date of filing: 2/2/2026

(d) Docket number, case number, or opinion number: [redacted]

(e) Result:

(f) Date of result: Waiting for Result

(g) Issues raised: none

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: Do not have any Criminal charges in my past or have been deported prior to any future respondings. I am not a flight risk to any decision.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

I will abide by any Constitutional laws to help me sustain a hopeful Verdict.

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes ☑ No

GROUND TWO: I have a Article 8 USCS 1226 Form which was delivered on 2/25/26.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

It will help me and give me time to handle my legal process in a professional and timely manner.

(b) Did you present Ground Two in all appeals that were available to you?

☑ Yes ☐ No

GROUND THREE:

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

N/A

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes ☐ No

GROUND FOUR: N/A

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

N/A

(b) Did you present Ground Four in all appeals that were available to you?

☑ Yes ☐ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: N/A

Request for Relief

15. State exactly what you want the court to do: I would like to be release to figure out a plan and steps, by collecting the proper legal work needed to obtain a permit. Im not a convicted felon or flight risk. Want an Opportunity to do things the right way.

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

8/10/26

I declare under penalty of perjury that I am the petitioner. I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 8/15/26

Douglas Francisco Hernandez Reyes

Signature of Petitioner

Signature of Attorney or other authorized person, if any

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

DUGLAS FRANCISCO,HERNANDEZ,REYES
A# [redacted]

PETITIONER,

EP-26 CV-00853-DB

V
Todd Blanche, Attorney General,
Mark Wayne Mullin, , Secretary Of The
Department OF Homeland Security,
MARY DE ANDA YBARRA, U.S. ICE
Field Office Director For,
''EOIR'' Field Office,
ERICA ESTRADA, Assistant
Field Office Director Of El Paso SPC.

Petition For A Writ Of Habeas Corpus
Pursuant To 28 U.S.C. §2241, By
A Person Subject To Indefinite
Immigration Detention.

Respondents

HONORABLE JUDGE

DAVID BRIONES MY NAME IS DUGLAS FRANCISCO HERNANDEZ REYES I,M TYPING THIS LETTER TOASK YOU AND THE COURT FOR AN OPPORTUNITY TO GET RELEASED,SO SO I CAN START A FARE AND CORRECT LEGAL PROCESS SO I CAN OBTAIN SOME KIND OF PERMISSION OR LEGAL STATUS TO STAY IN THE UNITED STATES.MY CASE HAS BEEN SENT TO THE B.I.A. I WOULD LIKE TO HAVE THE OPPORTUNITY TO PURSUE MY CASE FROM OUTSIDE SO I CAN PROVIDE THE BURDEN OF PROOF THAT THE JUDGE HAS ASKED ME TO GET AND A FEW MORE EVIDENCES THAT I HAVE THAT CAN HELP ME WITH MY CASE TO GIVE ME A BETTER CHANCE IN WINNING MY CASE. I HAVE NO CRIMINAL RECORD, I,VE NEVER BEEN DEPORTED, I AM NO DANGER TO MY COMMUNITY AND I AM NOT A FLIGHT RISK. I HAVE A JOB AND PLENTY OF SPONSORS THAT ARE WILLING TO SUPPORT MY WELL BEING WHILE THIS PROCESS IS TAKING PLACE. I ALSO HAVE CHILDREN AND A SISTER IN EL SALVADOR THAT DEPEND ON ME

FINANCIALLY IN ORDER FOR THEM TO SURVIVE POVERTY IN EL SALVADOR.THEY ARE REALLY STRUGGLING RIGHT NOW TO EAT AND MY SISTER IS VERY NOW SO SHE IS LIMITED ON THINGS SHE CAN DO FOR HER SELF OR OTHERS. I BEEN DETAINED FOR 9 MONTHS NOW AND I,M THEIR ONLY SOURCE OF INCOME I HAVE NO OTHER ISSUES PENDING SO I,M ASKING THE HONORABLE TO TAKE MY CASE IN CONSIDERATION AND RELEASE ME WITH A BOND OR SOME TYPE OF SUPERVISION

AWARD PETITIONER WITH HIS FREE AND RELEASE HIM.
GRANT ANY OTHER RELIEF THAT THIS COURT DEEMS IT IS JUST.

_I affirm, under penalty of perjury, that the foregoing is true and correct.

Respectfully submitted this on 8/15/26.

CASA MARIANELLA
821 Gunter Street • Austin, TX 78702
Tel: (512) 385-5571 • Fax: (512) 842-9360
supportletters@casamarianella.org
www.casamarianella.org

June 10, 2026

Duglas Francisco Hernandez Reyes
A# [redacted]
Country of Origin: El Salvador

El Paso Processing Center
8915 Montana Ave
El Paso, TX 79925

To whom it may concern,

Casa Marianella agrees to receive Duglas Francisco Hernandez Reyes. Casa Marianella is a shelter that serves immigrants, asylum-seekers, and asylees. We provide housing, case management, transportation (including bus fare from detention), and other supportive services to such individuals. **We are located at 821 Gunter Street, Austin, Texas 78702, and our office phone number is (512) 385-5571. Our phone line is often busy; to confirm sponsorship of Duglas Francisco Hernandez Reyes, it is best to contact the shelter's Support Letter Team at supportletters@casamarianella.org, with the individual's name and A# as the subject.** Casa Marianella is not open to the public, and we do not accept everyone who applies to stay with us. We have a strict screening process of individuals that contact us while in ICE custody, and Duglas Francisco Hernandez Reyes clearly meets all of our criteria.

Casa Marianella has been operating since 1986 and has welcomed residents from over 40 countries. Casa Marianella offers a wide variety of services to both residents and the greater immigrant community in Austin. Casa Marianella staff, who are present on site at all times, are trained and experienced in working with immigrants and refugees.

Upon arriving, each resident of Casa Marianella has access to a case manager who can support the individual in various capacities: obtaining services in the community, monitoring their behavior and well-being in the shelter, and ensuring that the individual attends ICE appointments and court dates. Casa Marianella can also connect residents to medical care and legal assistance.

Residents of Casa Marianella are expected to abide by strict house rules and participate in upkeep of the house. The residents participate in household chores every day, and they are expected to keep their

bed and belongings clean and orderly. The shelter has a strict curfew the residents must abide by, and each resident is required to attend a nightly meeting. While living at Casa Marianella, Duglas Francisco Hernandez Reyes will be expected to abide by house rules, abstain from drugs/alcohol, and refrain from the use of violence in any form.

Casa Marianella specializes in working with and managing asylum seekers while their immigration claims are pending, and we have extensive experience in this area. Casa Marianella staff assist residents in exiting the shelter and building self-sufficiency. In recent years, over 90% of residents who have exited the shelter have successfully transitioned into permanent housing.

In addition to shelter, case management, and access to legal and medical resources, residents at Casa Marianella can receive clothing and food. If they do not already speak English, residents are required to attend English classes four nights per week.

Casa Marianella's mission is to provide hospitality to immigrants and refugees. We appreciate the opportunity to serve refugees in need of housing during their immigration process. Thank you for your attention to this urgent matter.

Sincerely,

Paulina Licon
Operations Coordinator
Casa Marianella