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

JUDGE KATHLEEN CARDONE

UNITED STATES DISTRICT COURT

for the

Heidy Gricelda Quiróz Varela
Petitioner

v.

Departament of Homeland Security
Respondent
(name of warden or authorized person having custody of petitioner)

EP26CV2186

Case No. [redacted]
(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: Heidy Gricelda Quiróz Varela
   (b) Other names you have used: N/A
2. Place of confinement:
   (a) Name of institution: Departament of Homeland Security
   (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: N/A
   (b) Docket number of criminal case: [redacted]
   (c) Date of sentencing: N/A
   ☑ Being held on an immigration charge
   ☐ Other (explain): N/A

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,

☐ 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)*: N/A

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

(a) Name and location of the agency or court: N/A

(b) Docket number, case number, or opinion number: N/A

(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*: N/A

(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: N/A

(2) Date of filing: N/A

(3) Docket number, case number, or opinion number: N/A

(4) Result: N/A

(5) Date of result: N/A

(6) Issues raised: N/A

(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? J

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: N/A

(2) Date of filing: N/A

(3) Docket number, case number, or opinion number: N/A

(4) Result: N/A

(5) Date of result: N/A

(6) Issues raised: N/A

(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: N/A

(2) Date of filing: N/A

(3) Docket number, case number, or opinion number: N/A

(4) Result: N/A

(5) Date of result: N/A

(6) Issues raised: N/A

(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?

✓

If "Yes," provide:

(1) Name of court: N/A
(2) Case number: N/A
(3) Date of filing: N/A
(4) Result: N/A
(5) Date of result: N/A
(6) Issues raised: N/A

(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: N/A
(3) Date of filing: N/A
(4) Result: N/A
(5) Date of result: N/A
(6) Issues raised: N/A

(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: 07/20/2026
(b) Date of the removal or reinstatement order: N/A
(c) Did you file an appeal with the Board of Immigration Appeals?

If "Yes," provide:

(1) Date of filing: N/A

(2) Case number: [redacted]

(3) Result: N/A

(4) Date of result: N/A

(5) Issues raised: N/A

(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: N/A

(3) Case number: N/A

(4) Result: N/A

(5) Date of result: N/A

(6) Issues raised: N/A

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: N/A

(b) Name of the authority, agency, or court: N/A

(c) Date of filing: [redacted]

(d) Docket number, case number, or opinion number: N/A

(e) Result: N/A

(f) Date of result: N/A

(g) Issues raised: N/A

[redacted]

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: I entered this country on December 6, 2022 thorugh the Piedras Negras border crossing and went to New York. I lived For one year and six month and had a six-month relation ship during wich I was assaulted, abused, and beaten, I called the police and the judge issued a restraining order, but he Kept looking for me, beating me, and threatening to have my children, who are in Honduras, killed. That is why I had to move to midland TX, where I was arrested.

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

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

☐ Yes ☑ No

GROUND TWO: I have no criminal record. I have always lived with my Boy Friend, a permanent resident of this country For the past Five years. He is my sponsor and has always taken care of me. He owns property here in the US, a trucking company, and has always Filed his taxes.

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

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

☐ Yes ☑ No

GROUND THREE: I Was arrested by ice on July 20, 2026 in midland Texas. Then I Was transFered to the paso processing center. I submitted a notion oF bail, but the judge said that a lawyer appears in the system and he has to do that Forme, but I haven't hired a lawyer.

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

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

☐ Yes ☑ No

GROUND FOUR: I Filed a bail application under the Maldonado Bautista act, et al contra Ernesto Santa Cruz Jr etal Nº 5:25-Cv-01873-555-Bcm C:b call 2025 but I have not hired a lawyer For my case,

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

But it was denied because I have an attorney in the system a lawyer but I no't paid any lawyer.

(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: I need you to grant me bail so I can continue my case outside and marry my boyfriend.

Request for Relief

15. State exactly what you want the court to do.

With all due respect, your excellency, I need a bail bond or inmediate release. My husband Jorge E. Armijos is my sponsor and has been apermanet residend For Five years. He property in his name, including a two acre plot of land in [redacted] and trucking company, car and trucks that For the work in petroleum Wells in midland, Texas. I tried to apply For bail bond, but it was denied because I have attorney in the system but is a error. I hope you can help me, please. Thank you so mouch.

Declaration Under Penalty Of Perjury

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

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: 08/17/2026

Heidy Quiróz

Signature of Petitioner

Signature of Attorney or other authorized person, if any

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U.S. Department of Justice
Executive Office for Immigration Review
Immigration Court

8915 Montana Avenue - Suite 100
El Paso, Texas 79925

Date received: August 11, 2026

Memorandum to: Heidy Gricelda Quiroz Varela

From: EOIR/Immigration Court

Subject: Documents

Name: A#: [redacted]

The attached documents are being returned as it is missing one or more of the following information:

( ) A-Number

( ) Respondents/Applicant's Name

( ) Respondent/ Applicant's Complete Address Including Zip Code.

( ) Respondents/Applicant's Nationality/ Citizenship

( ) Date/Place of Entry

( ) Specific Citations/Charges

( ) No pending case with El Paso Courts.

( ) Authorizing Signatures (No "by" or "for" signatures)

( ) Address to appear in Court is incorrect.

( ) None or multiple boxes checked

(X) Other: System shows that you currently have an attorney. Any documents have to be submitted through and by your attorney of record.

__AD_____

Court Staff