

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, COLUMBUS DIVISION

Sayda Ayala o/b/o E.S.R-M. v. Warden, Stewart Detention Center, et
al.

Ayala · No. 4:26-cv-106-CDL-ALS · Decided February 5, 2026

SUMMARY

The United States District Court for the Middle District of Georgia grants Sayda Ayala permission to proceed as next friend on behalf of E.S.R-M. in a pro se habeas corpus action under 28 U.S.C. § 2241. The court extends the respondents’ deadline to respond to the amended application and sets a subsequent period for any reply.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Columbus Division
WRITING FOR THE COURT	Alfreda L. Sheppard
JURISDICTION	United States District Court for the Middle District of Georgia, Columbus Division
DECIDED	February 5, 2026
DOCKET	4:26-cv-106-CDL-ALS
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a putative next-friend pro se application for habeas corpus relief under 28 U.S.C. § 2241 on behalf of E.S.R-M. and moved to proceed as E.S.R-M.'s next friend. The court granted next-friend status and extended the respondents' deadline to respond to the amended habeas application.
STANDARD OF REVIEW	The court evaluated whether the allegations and supporting materials sufficiently established the requirements for next-friend representation in a habeas proceeding.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown

TOPICS

- federal habeas corpus
- standing
- civil procedure

PRACTICE AREAS

Federal habeas corpus

Immigration detention

Civil procedure

QUESTIONS PRESENTED

1. Whether Ayala sufficiently demonstrated that E.S.R-M. was unable to prosecute the habeas action because of inaccessibility and physical and linguistic barriers.
2. Whether Ayala had a significant relationship with E.S.R-M. and was dedicated to protecting his best interests, as required to proceed as his next friend.
3. Whether good cause existed to extend the time for respondents to respond to the amended habeas application.

HOLDINGS

1. Ayala sufficiently demonstrated E.S.R-M.'s inability to prosecute the action and her significant relationship with, and dedication to the best interests of, E.S.R-M.; therefore, she was permitted to proceed as his next friend.
2. Good cause existed to extend the time for respondents to respond to the amended application; respondents were given twenty-one days to file a comprehensive response, and petitioner was allowed fourteen days thereafter to file any desired reply.

KEY QUOTATIONS

“the Court finds Ms. Ayala has sufficiently alleged that E.S.R-M. is suffering from inaccessibility, combined with physical and linguistic barriers, sufficient to demonstrate that E.S.R-M. is incapable of prosecuting this action.”

“Further, the Court finds that Ms. Ayala has demonstrated her dedication to the best interests of E.S.R-M. and has a significant relationship with E.S.R-M. such that she should be permitted to proceed on his behalf.”

FACTUAL BACKGROUND

E.S.R-M. was alleged to be unable to prosecute the habeas action because of inaccessibility and combined physical and linguistic barriers. Sayda Ayala alleged a significant relationship with E.S.R-M. and demonstrated dedication to his best interests. The court found those allegations sufficient to permit Ayala to proceed on his behalf.

PROCEDURAL HISTORY

The court received the § 2241 application and next-friend motion on January 20, 2026. After ordering supplemental briefing regarding Ayala's request to proceed as next friend, the court reviewed her brief and declaration, granted the next-friend motions, and allowed respondents twenty-one days to file a comprehensive response to the amended application, followed by fourteen days for any reply.

DISPOSITION

other

CASES CITED

- Francis v. Warden, FCC Coleman-USP, 246 F. App'x 621, 622 (11th Cir. 2007)
- Whitmore v. Arkansas, 495 U.S. 149, 163-64 (1990)

OPINION

AYALA

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF GEORGIA

COLUMBUS DIVISION

SAYDA AYALA o/b/o E.S.R-M., : Petitioner, : v. : Case No. 4:26-cv-106-CDL-ALS Warden,
STEWART DETENTION : CENTER, et al., : Respondents. :

ORDER

On January 20, 2026, the Court received Ms. Sayda Ayala's putative next friend pro se application for habeas corpus relief under 28 U.S.C. § 2241 on behalf of E.S.R-M., and a motion to accept Ms. Ayala's next friend status on behalf of E.S.R-M. (ECF Nos. 1, 2). Having reviewed Ms. Ayala's brief and declaration in support of her status as next friend on behalf of E.S.R-M. in response to the Court's order for supplemental briefing on her request to proceed as next friend (ECF Nos. 4, 7), the Court finds Ms. Ayala has sufficiently alleged that E.S.R-M. is suffering from inaccessibility, combined with physical and linguistic barriers, sufficient to demonstrate that E.S.R-M. is incapable of prosecuting this action. *Francis v. Warden, FCC Coleman-USP*, 246 F. App'x 621, 622 (11th Cir. 2007) (quoting *Whitmore v. Arkansas*, 495 U.S. 149, 163 (1990)); see also 28 U.S.C. § 2242 (permitting an application for habeas relief to be signed by "someone acting in his behalf."). Further, the Court finds that Ms. Ayala has demonstrated her dedication to the best interests of E.S.R-M. and has a significant relationship with E.S.R-M. such that she should be permitted to proceed on his behalf. *Whitmore*, 495 U.S. at 163-64. Accordingly, Ms. Ayala's motions to proceed as next friend on behalf of E.S.R-M. (ECF Nos. 2, 5) are GRANTED. Further orders of this Court will refer to Ms. Ayala and E.S.R-M. jointly as Petitioner. Having also initially reviewed Petitioner's amended application (ECF No. 6), the Court finds good cause to extend the time for a response. 28 U.S.C. § 2243. Accordingly, Respondents shall have twenty-one (21) days to file a comprehensive response to said amended application. Within fourteen (14) days thereafter, Petitioner should file any desired reply. The Court will consider whether to hold an evidentiary hearing once briefing is complete. SO ORDERED, this 5th day of February, 2026.

s/ ALFREDA L. SHEPPARD
UNITED STATES MAGISTRATE JUDGE

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