

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ENRIQUE AQUILEO CONTRERAS
MARTINEZ,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants.

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Civil Action No. 4:25-CV-03806

**DEFENDANTS' STATEMENT IN COMPLIANCE WITH SHOW CAUSE
ORDER**

Defendants Kristi Noem, Todd Lyons, Marcos Charles, Bret A. Bradford, and Pam Bondi (collectively, "Defendants") file this Statement in response to the Court's order to show cause with respect to Plaintiff's detention (ECF No. 3).

Plaintiff was taken into custody on account that he is an alien unlawfully present in the United States. This action only seeks to obtain bond during the pendency of his removal proceedings.

As to Plaintiff's eligibility for bond, U.S. Immigration and Customs Enforcement ("ICE") does not contest that he should be able to post bond at this time, as the immigration judge's bond order was not stayed beyond the initial ten days. Plaintiff has informed Defendants that attempts to pay the bond online and in person have been rejected. In response, ICE has been working to update his information in the relevant systems and inform Enforcement and Removal Operations that Plaintiff is bond-eligible. ICE has been attempting to make the requisite corrections for both avenues and anticipates that Plaintiff

will imminently be able to post bond. Most recently, on August 20, 2025, ICE updated Plaintiff that he should be able to successfully bond out upon another online attempt, including re-submission of the obligor paperwork. Opposing counsel informed the undersigned that around 3:44 PM today (August 21, 2025), another attempt was made to pay bond online, and that application is under review. Defendants are optimistic that the system will successfully process the attempt and thereby resolve this dispute.

Dated: August 21, 2025

Respectfully submitted,

NICHOLAS B. GANJEI
UNITED STATES ATTORNEY

By: /s/ Shawn D. Ren
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CERTIFICATE OF SERVICE

I certify that on August 21, 2025, the foregoing was filed and served on counsel for Plaintiff via the Court's CM/ECF service.

/s/ Shawn D. Ren

Shawn D. Ren

Assistant United States Attorney