

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**GENEROSO VELASQUEZ SALAZAR,**

Petitioner,

vs.

**GEORGE DEDOS, WARDEN, CIBOLA  
COUNTY CORRECTIONAL CENTER**

**MARY DE ANDA-YBARRA, DIRECTOR  
OF EL PASO FIELD OFFICE, U.S.  
IMMIGRATION AND CUSTOMS  
ENFORCEMENT;**

**KRISTI NOEM, SECRETARY OF THE U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; AND**

**PAM BONDI, ATTORNEY GENERAL OF  
THE UNITED STATES,**

IN THEIR OFFICIAL CAPACITIES,

Respondents

CASE NO.: 1:25-CV-00835 -DHU-JMR

**MOTION TO PERMIT COUNSEL TO APPEAR REMOTELY AT HEARING**

Petitioner, through undersigned counsel, respectfully moves this Court for leave to appear remotely at the habeas hearing scheduled for September 15, 2025, in this matter. In support of this request, Petitioner states as follows:

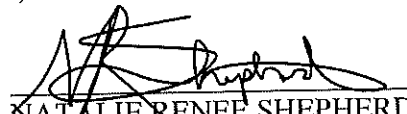
1. Counsel of record, Natalie Renee Shepherd, is located outside the District of New Mexico and is associated with a firm based in Los Angeles, California.

2. This case is being handled on a pro bono basis. Under the terms of the representation agreement, Petitioner is responsible only for government-imposed filing fees and costs, and does not have the means to pay for travel and accommodation for counsel to attend proceedings in New Mexico.
3. Requiring in-person appearance would therefore impose undue financial hardship on Petitioner and is inconsistent with the pro bono posture of this case.
4. Remote appearance would permit full participation by counsel without prejudicing Respondents.
5. Given the emergency nature of this habeas petition, remote appearance will also ensure that proceedings move forward efficiently and without unnecessary delay.
6. Courts possess discretion under Fed. R. Civ. P. 43(a), as well as their inherent case-management authority, to permit contemporaneous remote participation where good cause is shown.

For these reasons, Petitioner respectfully requests that the Court permit undersigned counsel to appear remotely at the habeas hearing scheduled for September 15, 2025.

DATED: September 9, 2025

Respectfully submitted,

  
NATALIE RENEE SHEPHERD  
Los Angeles Legal Advocates  
1025 W 190th St Suite 400  
Gardena, CA 90248  
(805) 907-5309  
NShepherd@LALegalAdvocates.com  
*Attorney for Petitioner*

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**DECLARATION OF NATALIE RENEE SHEPHERD IN SUPPORT OF MOTION TO  
APPEAR REMOTELY**

I, Natalie Renee Shepherd, hereby declare as follows:

1. I am counsel for Petitioner in the above-captioned habeas proceeding.
2. I make this declaration in support of Petitioner's Motion to Permit Counsel to Appear Remotely in connection with Petitioner's habeas hearing scheduled for September 15, 2025.

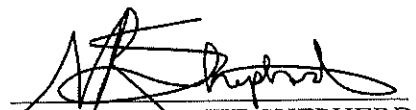
3. I am located outside the District of New Mexico and am associated with a law firm based in Los Angeles, California.
4. This case is being handled on a pro bono basis. Pursuant to the representation agreement, Petitioner is responsible only for government-imposed filing fees and costs. Petitioner does not have the means to pay for attorney travel and accommodation to attend proceedings in New Mexico.
5. Requiring in-person attendance would therefore impose undue financial hardship on Petitioner. Allowing remote appearance will permit me to participate fully while ensuring the case proceeds promptly and without unnecessary delay, and I am prepared to appear remotely by whatever platform the Court prefers.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 9, 2025

Brooklyn, New York

Respectfully submitted,



NATALIE RENEE SHEPHERD

Los Angeles Legal Advocates  
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*Attorney for Petitioner*