UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MAMUR NASIMOV, *Petitioner*, v. DAVID O'NEILL, et al. *Respondents*.	**Case No. 2:25-cv-07420-NIQA** **MOTION TO RECONSIDER**

INTRODUCTION

Petitioner respectfully motions this Honorable Court to reconsider its January 23, 2026, Order [Dkt. 14], wherein it denied Petitioner's request for immediate release. Petitioner's request for immediate release was in premised on this Court's orders [Dkt. 7, 9, & 11] wherein the Court repeatedly ordered that the Government's failure to provide Petitioner with a bond hearing by date certain (initially within five days of January 13, 2026 [Dkt. 7] and ultimately "no later January 21, 2026" [Dkt. 11]) would "***result in Mr. Nasimov's immediate release***." (emphasis in originals).

The judicial process works best when orders mean what they say. *Penn W. Assocs., Inc. v. Cohen*, 371 F.3d 118, 129 (3d Cir. 2004).

As this court is aware, the Government – specifically the Department of Homeland Security (DHS) and the Immigration Court – did in fact fail to provide Mr. Nasimov a bond hearing on or before January 21, 2026, because the matter had "'fallen off' the immigration judge's docket…" *See* Dkt. 13, Respondent's January 22, 2026, letter to Court.

Despite the Government's clear and admitted failure, the Court refused to enforce its orders. The Court's reasoned:

> Though sympathetic to his argument, Mr. Nasimov was provided with a bond hearing, *albeit* one day after the Court-ordered deadline. Accordingly, this Court finds no reason, except the lateness of the hearing, to now order his immediate release and disrupt the IJ's determination. Undisputedly, Mr. Nasimov received the remedy he requested and which this Court granted — ordering a bond hearing.

See Dkt. 14 (emphasis in original). Respectfully, for the reasons stated below, Petitioner requests that this honorable court reconsider its order because 1) due solely to the Respondents' actions and/or inactions, Petitioner was not in fact provided with a meaningful bond hearing; and 2) Petitioner reasonably relied on the legal force of this Court's orders.

I. COMPLETE FACTUAL BACKGROUND – JANUARY 13 - JANUARY 22, 2026

On December 31, 2025, this Court ordered that the government not move Mr. Nasimov from Philadelphia Federal Detention Center (FDC) during the pendency of these proceedings. *See* Dkt. 2.

On Tuesday, January 13, 2026, at 5:42PM, this Court issued a memorandum and order, granting the underlying Petition for Writ of Habeas Corpus, and ordering the government to provide Mr. Nasimov with a bond hearing within five days of the order, effectively giving the government three business days (January 14-16) to provide Petitioner with a bond hearing. *See* Dkt. 7. The order noted "***The failure to provide a bond hearing within the five days ordered, will result in Mr. Nasimov's immediate release.***" *Id.* (emphasis in original).

Pursuant to the order, a bond hearing was scheduled for Thursday, January 15, 2026 at 1PM.

On January 14, 2026, the Government, through counsel *via* email to chambers, requested use of a courtroom so that Petitioner could appear at his scheduled bond hearing. Even though bond hearings in immigration court are almost exclusively held virtually and simply require a laptop with a webcam, the United States Federal Government is unable to facilitate a bond hearing

while a detainee is at FDC. On that same day, Your Honor's chambers, *via* email, confirmed the availability of a courtroom for the bond hearing.

It is important to note that at this point, undersigned counsel's office did not represent Petitioner in his immigration court/bond proceedings. On January 14, 2026, Petitioner's attorney in removal/bond proceedings unexpectedly filed a motion to withdraw from his removal/bond proceedings. Only then, on January 14, 2026, did Attorney Colleen Doherty from undersigned counsel's office enter her appearance with the immigration court and requested a brief one-day continuance of the January 15, 2026, bond hearing for preparation.

Attorney Doherty's motion to continue the bond proceedings was mooted, when at 3:35PM on January 14, 2026, Your Honor's chambers emailed counsels that the courtroom was no longer available for the bond hearing. The Government was unable to secure another courtroom for the January 15, 2026, and *the Government rescheduled* Petitioner's bond hearing to Friday, January 16, 2026.

On January 15, 2026, *via* letter to the Court, Respondent's counsel requested courtroom access for the January 16, 2026, hearing, or in the alternative permission to transfer Petitioner to a facility where the hearing can be conducted. *See* Dkt. 8.

On that same day, the Court issued an order permitting the Government to transfer Petitioner to the Moshannon Valley Processing Center (MVPC) for the "*sole*" purpose of complying with the January 13, 2026 order. *See* Dkt. 9 (emphasis in original). The order also indicated that if Petitioner was denied bond, he was to be returned to FDC and allowed to file an appeal. *Id.* The order noted that the remainder of the January 13, 2026 order remained in effect and stated that "[t]he Government is reminded that failure to provide a bond hearing within the five days ordered will result in Mr. Nasimov's immediate release." *Id.*

Despite the Court's order, the Government was unable to transfer Petitioner to MVPC in time for his January 16, 2026 bond hearing for logistical reasons. *See* Dkt. 10. Accordingly, on January 16, 2026, *via* letter to the Court, Respondent's counsel requested an extension of the Court's deadline, stating that Petitioner's bond hearing could take place on January 20 or 21, 2026. *Id.*

On January 16, 2026, upon consideration of the Government's letter, the Court granted Respondents' request for an extension, and ordered "that the Government must hold the ordered bond hearing by no later than January 21, 2026. ***Failure to comply with this order will result in Mr. Nasimov's immediate release.*"** *See* Dkt. 11 (emphasis in original).

Over the following weekend, Petitioner was transferred to MVPC.

Despite being transferred to MVPC over the weekend – a bond hearing was never scheduled or held on January 20 or 21, 2026. According to the Government – and despite the Orders of this Court – Petitioner's matter had "fallen off" the immigration judge's docket.

On January 22, 2026, undersigned counsel reached out to Government counsel about effectuating Petitioner's "immediate release" from detention, pursuant to this Court's orders. Petitioner's friend drove to MVPC to retrieve him.

a. Attorney Doherty's Representation of Petitioner Before the Immigration Court

Attorney Colleen Doherty has provided the attached declaration in support of this motion. *See* Exhibit B. Attorney Doherty's declaration avers the following key information:

- On January 14, Mr. Nasimov's prior counsel stated that he would not represent Mr. Nasimov at the bond hearing. That day, Mr. Nasimov retained my law firm to represent him at the bond hearing. That day, I emailed OPLA to request their position on a motion to continue to give my office one additional day to collect evidence from prior counsel and prepare for the bond hearing. **ACC Jon Staples replied that DHS did not oppose such a motion** … **The Immigration Court never ruled on that motion.** Exhibit B, at ¶¶ 8-9.

- On Thursday, January 15, 2026 at 1:00pm, I attended the first scheduled bond hearing for Mr. Nasimov via Webex before IJ Mullican. ACC Jon Staples appeared for the government. **DHS did not produce Mr. Nasimov for the hearing.** I stated that I wanted Mr. Nasimov to be present for the bond hearing. We did not discuss the motion to continue and the IJ did not rule on the motion to continue. **The IJ scheduled another bond hearing for the following day so DHS could produce Mr. Nasimov.** Mr. Staples stated on the record that DHS was working to coordinate a courtroom where Mr. Nasimov could appear. *Id.* at ¶¶ 4-5.

- On the morning of Friday, January 16, 2026, ICE Moshannon informed me that DHS had not yet transferred Mr. Nasimov to Moshannon, and so I knew that he would not appear for the bond hearing that day. I did not file evidence prior to the bond hearing that day because I would not agree to proceed without Mr. Nasimov's presence. *Id.* at ¶ 7.

- On Friday, January 16, 2026 at 1:00pm, I attended the second scheduled bond hearing for Mr. Nasimov via Webex before IJ Chen. ACC Chris Miller appeared for the government. **DHS did not produce Mr. Nasimov for the hearing and had not yet moved him to Moshannon.** During that hearing, I stated that I did not consent to go forward with the bond hearing without Mr. Nasimov's presence, **particularly given the District Court's order that he be moved for the purpose of attending.** *Id.* at ¶¶ 8-9.
-

- **IJ Chen stated that she would not proceed with the bond hearing with Mr. Nasimov in absentia** given my request that he be present. She said that she was not continuing the case but would set the bond hearing for Tuesday, January 20 at 1:00pm. She stated that she did not know before which IJ the hearing would take place. *Id.* at ¶12.

- On Tuesday, January 20, 2026, in anticipation of a bond hearing that afternoon, I filed evidence in support of the request for a bond. However, EOIR never issued a Case Notice scheduling a new bond hearing, and Mr. Nasimov's ECAS never showed a bond hearing before any IJ. *Id.* at ¶14.

b. Petitioner's January 22, 2026, Sham Bond Hearing

Petitioner was not provided with a meaningful bond hearing.

At approximately 2:15PM on Thursday, January 22, 2026, undersigned counsel's office received a phone call from the Elizabeth Immigration Court, demanding that an attorney be present in Immigration Judge (IJ) Dennis Ryan's virtual courtroom at 2:30PM for a bond hearing. Attorney Doherty – who was the sole attorney handling Petitioner's bond proceedings, including

submission of the evidence and all preparation – was in separate immigration proceedings at that time, with another immigration judge. Accordingly, with 15 minutes notice and no prior involvement with Petitioner's bond proceedings, at 2:30PM, undersigned counsel appeared in IJ Ryan's virtual courtroom, and respectfully explained that per *this Court's* orders, Petitioner was to be released from custody without a bond hearing and that it was counsel's understanding that Petitioner's release was being effectuated.

IJ Ryan averred that the immigration court was in compliance with *this Court*'s orders – despite the very clear and unambiguous language of those orders – because it had provided Petitioner with a bond hearing on January 15 and 16, 2026, and solely due to Attorney Doherty's actions – and that through no fault of the immigration court's – the bond hearing had been rescheduled. **IJ Ryan said nothing of the matter "fall[ing] off" the immigration court's docket.**

Undersigned counsel attempted to explain that the immigration court's understanding was incorrect, and that the sole reason the hearings had not gone forward was due to the Government's inability to produce Petitioner for the bond hearings. IJ Ryan stated that undersigned counsel's statements to the immigration court were **"disingenuous" and "frivolous."** Undersigned counsel's statements and recitation of the facts of Mr. Nasimov's bond proceedings were in fact completely accurate.

IJ Ryan then demanded that undersigned counsel present Mr. Nasimov's bond request; undersigned counsel – who had no prior involvement in the preparation of Mr. Nasimov's bond proceedings, and **acting in full reliance on the plain language of the Court's orders, which undersigned counsel reasonably understood would be enforced according to its expressed and unambiguous terms** – reiterated that the bond hearing was being held in violation of this Court's order, and expressed that the bond hearing was moot as Mr. Nasimov would be released

pursuant to this Court's orders. IJ Ryan, after hearing from the Department of Homeland Security (DHS) attorney, denied Mr. Nasimov's bond, finding him to be a flight risk. *See* Exhibit A, containing IJ's bond decision.

II. RECONSIDERATION

With full knowledge of the factual history of this matter, this Honorable Court should reconsider its January 23, 2026, Order [Dkt. 14] and enforce its January 13, January 15, and January 16 Orders, ordering Petitioner's immediate release.

Failure to enforce those orders sets a dangerous precedent for administrative Immigration Judges to flout an Article III Federal Judge's orders. Per the Government's own admission, the immigration court in this instance did not act diligently in attempting to comply with Your Honor's order; in fact, despite Your Honor's explicit and unambiguous order(s), the immigration court let Petitioner's case carelessly fall off the immigration court's docket. This disregard for the Court's order is compounded by the fact that Your Honor explicitly found that Mr. Nasimov's detention was unconstitutional, which the immigration court also appears to disregard. *See* Dkt. 6, p. 9. Failing to enforce the Court's orders and order the release of Petitioner sends a dangerous message to the immigration courts during a very dangerous time in immigration courts.

Immigration judges like Judge Ryan who presided over Petitioner's bond hearing are not part of the federal judiciary but are instead employees of the U.S. Department of Justice, which is under the direction of President Donald Trump's administration and is enforcing his hard-line immigration agenda.

This is not hyperbole *nor* an isolated incident – on January 16, 2026, Chief Immigration Judge Teresa Riley sent a directive to all immigration judges to *not* comply with a nationwide Federal Court order to provide bond hearings to *Maldonado Bautista v. Santacruz* class members.

See AILA Practice Alert: *EOIR Issues Nationwide Guidance on Maldonado Bautista*, AILA Doc. No. 26011404 (Jan. 16, 2026), available at https://www.aila.org/library/practice-alert-eoir-issues-nationwide-guidance-on-maldonado-bautista. As the Judge in *Maldonado Bautista* is "very worried" about immigration courts believing they are not bound by Federal Court orders, so to should this Court be worried. *See, Top US immigration judge says bond hearings should be denied despite court rulings, documents show*, Reuters (Jan. 20, 2026), https://www.reuters.com/legal/government/us-judge-worried-about-immigration-courts-not-complying-with-rulings-requiring-2026-01-20/.

Further, when undersigned counsel found himself – with 15 minutes notice – before the immigration court a full day beyond this Court's deadline, he reasonably relied on the plain text of the Court's order. "If it is black-letter law that the terms of an unambiguous private contract must be enforced irrespective of the parties' subjective intent, see 11 R. Lord, Williston on Contracts § 30:4 (4th ed.1999), **it is all the clearer that a court should enforce a court order, a public governmental act, according to its unambiguous terms."** *Travelers Indem. Co. v. Bailey*, 557 U.S. 137, 150–51, 129 S. Ct. 2195, 2204, 174 L. Ed. 2d 99 (2009) (emphasis added). Parties make significant decisions based on court orders, including s litigation strategy, requiring certainty that plain language will be enforced.

A federal judge's order must provide clear, reliable notice of what is required and by when. Fundamental principles of due process prohibit penalizing a party or counsel for conduct that was consistent with the unambiguous text of a court's directive. *See, e.g.*, *FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253 (2012) (due process requires "fair notice" of what conduct is required or prohibited). Where an order is clear on its face, courts may not later impose

consequences based on unstated expectations, implied understandings, or post hoc reinterpretations.

This principle is especially critical where, as here, counsel was compelled to act under extreme time pressure and in a separate adjudicatory forum. To hold otherwise would place counsel in an untenable position—forced to guess whether compliance with the plain text of a federal court order will later be deemed insufficient based on unwritten assumptions. The rule of law does not tolerate such uncertainty. *See, e.g. Int'l Longshoremen's Ass'n v. Phila. Marine Trade Ass'n*, 389 U.S. 64, 76 (1967) (a party may not be held in contempt unless the order "set forth in specific detail an unequivocal command").

Accordingly, where counsel acted in good-faith reliance on the unambiguous language of this Court's Order, any finding adverse to counsel would contravene settled Supreme Court precedent, basic due-process guarantees, and the fundamental requirement that federal court orders mean what they say.

Lastly, and certainly not least, this Court should not permit IJ Ryan to skew the plain and unambiguous language of this Court's orders. IJ Ryan attempted to argue that despite holding the bond hearing on January 22, 2026, the immigration court was in compliance with the Cout's order because it had attempted to provide Mr. Nasimov with a bond hearing on or before January 21, 2026. "Recognizing a power in one judge to conclude that another judge did not intend to do what she in fact did is fraught with danger." *Snow Machines, Inc. v. Hedco, Inc*., 838 F.2d 718, 727 (3d Cir. 1988). It opens a gaping hole in the carefully constructed legal principles governing standards of appellate review. *Id.* By failing to order Petitioner released, this Court is in essence ceding power to the immigration court to interpret the Federal Court's orders as it pleases and without consequence.

III. CONCLUSION

Accordingly, for the reasons stated above, Petitioner respectfully requests that this Honorable Court reconsider its January 23, 2026, Order [Dkt. 14], and order Petitioner's immediate release from Respondents' custody.

Respectfully Submitted,

Date: January 28, 2026

s/Christopher M. Casazza
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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MAMUR NASIMOV,

Petitioner,

v.

DAVID O'NEILL, et al.

Respondents.

Case No. 2:25-cv-07420-NIQA

MOTION TO RECONSIDER

EXHIBIT INDEX

A. Copy of IJ Ryan's Order denying Petitioner's Bond. 1-3

B. Declaration of Attorney Colleen Doherty. 4-5

C. Index of Evidence Submitted to immigration Court in support of Bond. 6

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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
ELIZABETH IMMIGRATION COURT

Respondent Name:
NASIMOV, MAMUR MARUFJONOVICH

To:
Casazza, Christopher Michael
1528 Walnut St
Suite 1701
Philadelphia, PA 19102

A-Number:
[redacted]

Riders:
In Custody Redetermination Proceedings

Date:
01/22/2026

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

☑ Denied, because
This bond hearing was held pursuant to a habeas order ordering a bond hearing to be held. Accordingly, the court has jurisdiction to conduct this bond hearing.

As a threshold matter, the court rejects arguments made by respondent's counsel that this bond hearing was not held within 5 days as required by the District Court's order. The respondent's initial bond hearing was scheduled for January 15, 2025. See Exh 3. The respondent's attorney requested a continuance of the bond hearing at their request due to the fact that they were not prepared to proceed that day. See Exh 4. The Court granted the continuance and the case was thereafter reset. The court finds the delay of the originally scheduled bond hearing was due to the respondent's request and that any arguments advanced that this hearing was not properly conducted according to the District Court's order are foreclosed by the fact that the Immigration Court had afforded him a hearing within the required time. Notwithstanding that, the respondent was still unprepared at his initially scheduled hearing.

This is further evidenced by the fact that the filing date for respondent's evidence was January 20, 2026. See Exh 6. The court finds that because the respondent filed this evidence past the 5 days beyond when this originally scheduled hearing was supposed to occur on January 15, 2026, the respondent could not possibly have been prepared to proceed earlier than then when it is his burden to show he is not a danger or flight risk.

Further, as required by the District Court order, this was conducted pursuant to 236(a) of the INA wherein the respondent bears the burden of showing he is not a danger to the community or a flight risk. The respondent was offered the opportunity to present

any arguments after the court confirmed it was in receipt of all evidence and admitted the same, however, respondent's counsel declined to present any arguments deeming this hearing "moot".

The court finds the respondent is significantly a flight risk. He has very limited time in the United States that is just over two years. He entered the United States without inspection, which is illegal under 8 U.S. Code § 1325 and shows a contumacious disregard for entering the United States legally and complying with federal law. He has produced no evidence of any immediate family who reside here. The letters he included are from friends and individuals who know him do not show any substantial ties to the United States. None of them are from anyone who is family or related to him. Despite having an application on file, and appearing to work in the United States, he also has shown no proof of payment of taxes as required by federal law which further evidence's the respondent's lack of regard for following the laws of the United States.

Further, the respondent's application is incomplete and non-compliant with Matter of C-A-R-R-, 29 I&N Dec. 13 (BIA 2025). It has no answers filled in with any substantive responses. With such incompleteness, his application is speculative at best and is at this moment subject to possible pretermission. It is impossible for the court to conclude that he has any strength to this application with the lack of a complete application.

Accordingly, the court finds the respondent has failed to meet his burden to show he is not a flight risk and bond is denied.

*The court will supplement this order with a bond memorandum should either side appeal this decision to the Board of Immigration Appeals. The above findings of fact and law are provided as a summary.

☐ Granted. It is ordered that Respondent be:
- ☐ released from custody on his own recognizance.
- ☐ released from custody under bond of $
- ☐ other:

☐ Other:

Immigration Judge: Ryan, Dennis 01/22/2026

Appeal: Department of Homeland Security: ☑ waived ☐ reserved
Respondent: ☐ waived ☑ reserved
Appeal Due: 02/23/2026

Certificate of Service

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To: [ ] Alien | [ ] Alien c/o custodial officer | [E] Alien atty/rep. | [E] DHS
Respondent Name : NASIMOV, MAMUR MARUFJONOVICH | A-Number : [redacted]
Riders:
Date: 01/22/2026 By: DAVIS, LAQUAN, Court Staff

AFFIDAVIT

I, **Colleen E. Doherty, Esq.**, certify, under penalty of perjury under the laws of the United States of America as stated in 18 USC § 1546(a) and 28 USC § 1746, that the statements in this affidavit are true and correct.

1. On January 14, 2026, EOIR issued a Case Notice scheduling a bond hearing for Mamur Nasimov on Thursday, January 15 at 1:00 PM before IJ Leila Mullican. On January 14, Mr. Nasimov's prior counsel stated that he would not represent Mr. Nasimov at the bond hearing. That day, Mr. Nasimov retained my law firm to represent him at the bond hearing.

2. That day, I emailed OPLA to request their position on a motion to continue to give my office one additional day to collect evidence from prior counsel and prepare for the bond hearing. ACC Jon Staples replied that DHS did not oppose such a motion. I filed the unopposed motion for continuance via ECAS on January 14 at 3:25pm, requesting that the bond hearing be moved to January 15. The Immigration Court never ruled on that motion.

3. The clerk for the District Court and Assistant U.S. Attorney Peter Carr had informed my office that a courtroom was no longer available for Mr. Nasimov on January 15. Therefore, I knew that DHS would be unable to produce my client. I did not file evidence prior to the bond hearing that day because I would not agree to proceed without Mr. Nasimov's presence.

4. On Thursday, January 15, 2026 at 1:00pm, I attended the first scheduled bond hearing for Mr. Nasimov via Webex before IJ Mullican. ACC Jon Staples appeared for the government. DHS did not produce Mr. Nasimov for the hearing. I stated that I wanted Mr. Nasimov to be present for the bond hearing.

5. We did not discuss the motion to continue and the IJ did not rule on the motion to continue. The IJ scheduled another bond hearing for the following day so DHS could produce Mr. Nasimov. Mr. Staples stated on the record that DHS was working to coordinate a courtroom where Mr. Nasimov could appear.

6. Subsequently, EOIR issued another Case Notice scheduling a bond hearing on Friday, January 16, 2026 at 1:00 PM before IJ Shanda Chen. That day, the District Court ordered that Mr. Nasimov be moved to Moshannon Valley Processing Center for the purpose of appearing at his bond hearing.

7. On the morning of Friday, January 16, 2026, ICE Moshannon informed me that DHS had not yet transferred Mr. Nasimov to Moshannon, and so I knew that he

would not appear for the bond hearing that day. I did not file evidence prior to the bond hearing that day because I would not agree to proceed without Mr. Nasimov's presence.

8. On Friday, January 16, 2026 at 1:00pm, I attended the second scheduled bond hearing for Mr. Nasimov via Webex before IJ Chen. ACC Chris Miller appeared for the government. DHS did not produce Mr. Nasimov for the hearing and had not yet moved him to Moshannon.

9. During that hearing, I stated that I did not consent to go forward with the bond hearing without Mr. Nasimov's presence, particularly given the District Court's order that he be moved for the purpose of attending.

10. Mr. Miller stated that I asked the hearing to be moved the day prior despite the availability of a courtroom and that I could agree to hold the hearing without Mr. Nasimov's presence if I wanted. He later stated that the District Court stated that DHS was not allowed to use any of their courtrooms. He stated that Mr. Nasimov was not presence due to DHS's inability to move him in such short notice.

11. Mr. Miller asked if EOIR could provide a courtroom on Sunday to hold the bond hearing then, as that was the final day to comply with the District Court's order. I stated that I was available for a bond hearing on Sunday.

12. IJ Chen stated that she would not proceed with the bond hearing with Mr. Nasimov in absentia given my request that he be present. She said that she was not continuing the case but would set the bond hearing for Tuesday, January 20 at 1:00pm. She stated that she did not know before which IJ the hearing would take place.

13. Within minutes of the end of that hearing, the District Court granted an extension of the deadline to hold the bond hearing to the following Wednesday, January 21. DHS moved Mr. Nasimov to Moshannon that weekend.

14. On Tuesday, January 20, 2026, in anticipation of a bond hearing that afternoon, I filed evidence in support of the request for a bond. However, EOIR never issued a Case Notice scheduling a new bond hearing, and Mr. Nasimov's ECAS never showed a bond hearing before any IJ.

01/28/2026
Date

Colleen E. Doherty, Esq.

Uploaded on: 01/20/2026 at 10:45:11 AM (Eastern Standard Time) Base City: ELZ

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Detained

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

In the Matter of:	)	
	)	
NASIMOV, Mamur Marufjonovich	)	File No: A [redacted]
	)	
Respondent	)	In Bond Proceedings

RESPONDENT'S NOTICE OF INTENT TO OFFER EVIDENCE

Judge: Not assigned **Bond Hearing:** January 20, 2026 at 1:00 PM

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Exh. 6 -

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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

In the Matter of:	)	
	)	
NASIMOV, Mamur Marufjonovich	)	File No: A [redacted]
	)	
Respondent	)	In Bond Proceedings

RESPONDENT'S NOTICE OF INTENT TO OFFER EVIDENCE IN SUPPORT OF BOND REDETERMINATION

TAB	DESCRIPTION	PAGE
	ABILITY TO POST BOND	
A.	Letter from Shuhrat S. Obloyorov, who has agreed to pay Respondent's bond	1
B.	U.S. Passport of Shuhrat S. Obloyorov	2
C.	*Obligor's Income:*	3-65
	1. 2024 Individual Income Tax Return of Shuhrat S. Obloyorov 2. 2024 Business Income Tax Return of Logex Transportation 3. 2025 Profit and Loss records of Logex Transportation	
	FAMILY & COMMUNITY TIES	
D.	*Letters of Support Attesting to Good Moral Character:*	
	1. Daler Khamidov, Chairmain of the Pennsylvania Branch of the Forum of [redacted] ☐ Describing Respondent as "a respected member of the [redacted] community in the United States[.]" ☐ "He treats others with respect, helps those in need, and consistently contributes to the well-being of his community. He is tolerant, multicultural, and law-abiding." ☐ Describing Respondent as "an active and dedicated member of our organization. He regularly participates in	66-67

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Exh. 6 -

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the implementation of social projects and takes part in charitable activities."

2. Davlat Kendjaev, Respondent's friend and coworker: 68-69
   - Describing Respondent as "a kind, charismatic, and genuinely compassionate person. He is a devoted family man who deeply values responsibility, honesty, and helping others."
   - "I clearly remember a situation in our hometown when a local family lost their primary source of income due to a medical emergency. Mamur personally organized the collection of financial assistance, coordinated support from neighbors, and ensured that the family had food and necessities until they were back on their feet. He did not seek recognition for this—helping others has always been part of who he is."
   - Describing Respondent as "one of the most reliable, hardworking, and dependable individuals I have worked with… He is also one of the few people who consistently steps forward to to help others in urgent or stressful situations, without being asked."
   - "From my personal and professional experience, I firmly believe that Mr. Nasimov poses no risk of flight or danger to the community. He has strong moral character, deep family and community ties, and a clear intention to continue working honestly and lawfully… he has consistently demonstrated respect for rules, authority, and social responsibility. I am confident he will fully comply with all court requirements and immigration proceedings if released.

3. Amir Kosimov, Respondent's friend: 70-72
   - "From a very young age, Mamur stood out as a caring responsible, and selfless person."
   - Describing "an incident from our childhood when one of our neighbors' homes was severely damaged by a fire… [Respondent] spent says assisting them, even though he was just a teenager at the time. This was not an isolated event—it reflected his natural sense of responsibility and empathy for others."

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- "He is the type of individual who avoids conflict, respects the law, and consistently tries to do what is right, even when it requires personal sacrifice."
- "Based on my lifelong knowledge of Mr. Nasimov, I firmly believe that he does not pose any risk to the community of failing to comply with court requirements… I am confident that he will honor all conditions set by the court and continue to conduct himself with integrity and respect for the law."

4. Sharif Usupov, Respondent's friend and coworker: 73-74
   - Describing Respondent as "a calm, responsible, and trustworthy person" and "a disciplined, safety-oriented, and dependable truck driver who takes his responsibilities seriously."
   - "Based on my long-term personal relationship with Mr. Nasimov and my professional experience working with him, I firmly believe that he poses no risk to the community and no risk of failing to comply with court requirements. He has strong moral values, a consistent work ethic, and deep respect for the law."

5. Ozod Soliev, President of [redacted] Cultural Center: 75-76
   - Respondent "was taught to respect others, assist those in need, do good, practice tolerance, embrace multiculturalism, and abide by the law."
   - Describing Respondent as "a highly educated, cultured, and respectful individual."
   - Respondent "plays an active role in socially significant projects within the [redacted]community in the United States… He also volunteers his time and efforts at our community gatherings."

6. Sherrozjon Ablayarov, CEO of Logex Transportation, LLC: 77
   - Respondent "has demonstrated a consistent commitment to professionalism, responsibility, and safe driving practices throughout his employment."

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Exh. 6 -

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- "Mr. Nasimov has proven himself to be a reliable and dependable employee… His conduct reflects good character and sound judgment."

FIXED ADDRESS & EMPLOYMENT HISTORY

E.	Letter from Logex Transportation, LLC, confirming employment since September 2024	78
F.	Settlement Statement from Logex Transportation, LLC, listing home address at 13657 Philmont Ave. Apt 3, Philadelphia, PA 19116, and most recent pay	79-81

APPLICATION FOR RELIEF

G.	Copy of timely-filed I-589, Application for Asylum, Withholding of Removal, and Protection under the CAT	82-93

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MAMUR NASIMOV, *Petitioner*, v. DAVID O'NEILL, et al. *Respondents*.	**Case No. 2:25-cv-07420-NIQA** **MOTION TO RECONSIDER**

THIS CAUSE comes before the Court upon review of the Petitioner's Motion for Reconsideration [ECF 16], motioning this Court to reconsider its January 23, 2026, Order [Dkt. 14].

THE COURT has reviewed the Petitioner's motion reconsideration. Upon consideration of that motion, the Court grants the motion and **ORDERS that Petitioner be immediately released from Respondents' custody**. IT IS SO ORDERED.

DONE AND ORDERED, on _____ ___, 2026.

_____
Hon. NITZA I QUINONES ALEJANDRO
UNITED STATES DISTRICT JUDGE